PULP
PENNSYLVANIA
UTILITY LAW PROJECT

October 21, 2025

Via Email Only

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Second Street, Second Floor
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2025-3053499

Secretary Homsher:

Please find the attached copy of the **Reply Exceptions of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

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CC: Honorable Jeffrey A. Watson (via email jeffwatson@pa.gov)
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Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3053499
	:	
Columbia Gas of Pennsylvania, Inc.	:	

Certificate of Service

I hereby certify that I have on this day served copies of the **Reply Exceptions being submitted on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** 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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October 21, 2025

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3053499
	:	
Columbia Gas of Pennsylvania, Inc.	:	

REPLY EXCEPTIONS OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA (INTERVENOR)

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I. INTRODUCTION

On October 14, 2025, Columbia Gas of Pennsylvania, Inc. (Columbia) filed Exceptions to the Recommended Decision (RD) of the Honorable Administrative Law Judges (ALJs) Jeffrey A. Watson and Chad Allensworth. The RD correctly finds that Columbia failed to meet its burden of proof to show its proposed rates and attendant policies, services, and programs are just, reasonable, and in the public interest. Based on this finding, and as supported by substantial evidence in this case, the RD correctly recommends that the Commission reject Columbia's proposed rate increase, its proposed 85.3% increase to its residential customer charge, its unjust and unreasonable Weather Normalization Adjustment charge, its premature Rate EDDS proposal, and its inequitable Phase II Energy Efficiency and Conservation Plan.[1] In turn, the RD ordered appropriate remediation of identified service deficiencies, including improved education for low income shopping customers, routinized universal service screening and referral, and critical customer data protections.

Columbia's Exceptions are rooted in the assumption that it is *entitled* to frequently and rapidly increase rates without consideration of or respect for the deep and harmful impact on its customers. Columbia's Exceptions are packed with mischaracterizations and rhetorical flourish to disguise the weakness of the Company's arguments and its failure to put forth substantial evidence to support its case. Columbia argues at every turn that the RD fails to consider Columbia's arguments. The fact is the RD plainly considered Columbia's arguments yet found at each turn that the opposing parties' arguments and the evidence in support thereof were more persuasive.

For the following reasons, and as outlined in CAUSE-PA's Briefs, the Commission should reject Columbia's unfounded Exceptions and adopt the well-reasoned and strongly supported RD.[2]

[1] The RD also appropriately rejected Columbia's Revenue Normalization Adjustment. Columbia did not file Exceptions as to this issue and thus has waived any claim of error. RD at 500-501, 671; CPA Exceptions at 22.
[2] Unless necessary for context, CAUSE-PA will not reprint here the extensive legal analysis and citations included in its briefs. CAUSE-PA will cite to the relevant pages of its briefs that contain those cites and legal analysis.

II. REPLY EXCEPTIONS

A. Reply to Columbia Exception No. 1: The RD correctly denied Columbia's proposed rate increase, which would add to Columbia's already unaffordable rates and disproportionately, detrimentally impact low income customers.

CAUSE-PA supports the RD's recommendation that the Commission reject Columbia's proposed rate increase. The RD correctly explains that Columbia has not carried its burden to demonstrate that it is unable to earn sufficient revenue and a fair return that allows it to comply with its obligation to serve and provide reliable, safe, and adequate service with its current rates.[3] This conclusion is well supported by substantial evidence in the record and appropriately balances the interests of Columbia, its ratepayers, and the public interest in accord with well-established principles of ratemaking. As the RD explains, the Commission's discretion to determine if a requested rate is just and reasonable is not confined to "an absolute or mathematical formulation but rather to confer upon the regulatory body the power to make and apply policy."[4]

In its first Exception, Columbia argues the RD erred in rejecting its proposed rate increase "*sua sponte*" – without applying a "traditional ratemaking formula."[5] This assertion is wrong on the law and the facts. There is not a shred of law or policy to support the existence of a "traditional ratemaking formula."[6] As discussed below, the law requires Columbia to establish the justness and reasonableness of each element of its requested rates based on substantial record evidence, and the RD correctly concludes that Columbia has failed to satisfy that burden.[7] Not only is there substantial evidence to support the ALJ's rejection of Columbia's proposed rate *increase*, there is ample record evidence that Columbia's rates should in fact be *decreased*.[8]

[3] RD at 112-114, 117-118.
[4] *Id.* at 117.
[5] CPA Exceptions at 4, 6.
[6] OCA MB at 28, 42-43.
[7] CAUSE-PA MB at 11; 66 Pa. C.S. §§ 315 (a), 1308 (a).
[8] OCA MB at 28, 42-43.

The rate-making process under the Public Utility Code requires the Commission to balance all interests to determine the justness and reasonableness of rates.[9] While Columbia argues that the RD erred by not applying Columbia's concocted "traditional ratemaking formula," the Commission's discretion is not confined "to an absolute or mathematical formulation" – but instead "imports a flexibility in the exercise of a complicated regulatory function."[10] The Commission's fundamental job in setting just and reasonable rates is to restrain the monopolistic tendencies of public utilities – ensuring service is accessible to all customers while providing a utility the *opportunity* to recover prudent and reasonable costs and earn a fair rate of return.[11]

The RD's basis for rejecting the proposed rate increase was far from "*sua sponte*."[12] CAUSE-PA has consistently opposed Columbia's proposed rate increase,[13] and the record is replete with evidence that the Commission should in fact ***decrease*** Columbia's revenue requirement by $36,316,933, or -3.96%.[14] There is also overwhelming evidence that Columbia's customers (especially the nearly 100,000 estimated low income households in its service territory) cannot afford an additional rate increase, and that further increasing rates would be unjust and unreasonable.[15] The RD cites to substantial evidentiary support regarding the impropriety of Columbia's request to further increase its rates, which are already the highest among all Pennsylvania NGDCs, while its customers face acute energy insecurity and the severe attendant consequences that follow.[16] The RD also cites public input testimony from Columbia customers, including the firsthand account of consumers struggling to keep up in the face of Columbia's

[9] RD at 117; CAUSE-PA MB at 5-7.
[10] CAUSE-PA MB at 6; *Popowsky v. Pa. PUC*, 665 A.2d 808, 812 (Pa. 1995).
[11] CAUSE-PA MB at 5-6; *Pa. Gas & Water Co. v. Pa. PUC*, 341 A.2d 239, 251 (Pa. Commw. Ct. 1975); *Federal Power Comm'n v. Hope Nat'l Gas Co*., 320 U.S. 591, 603 (1944).
[12] CPA Exceptions at 6.
[13] CAUSE-PA MB at 2-3, 14.
[14] *Id.* at 3, 6; OCA MB at 28, 42-43.
[15] RD at 13-23, 105-118; CAUSE-PA MB at 19-28; OCA MB at 18-21, 24-25, 34, 197-201, 287-304.
[16] RD at 117; *see also* CAUSE-PA MB at 18-22.

frequently and rapidly increasing rates.[17] The RD explicitly considered Columbia's arguments to the contrary, but found this evidence more persuasive.[18] Ultimately, while Columbia may not like the ALJ's decision, but Columbia simply failed to carry it burden on the record.

Columbia points to the Commission's 2021 Order overturning the recommendation to reject its proposed rate increase as support that the recommendation in this case should also be overturned.[19] This decision is readily distinguished. In the 2021 case, the Commission rejected the RD because it was based solely on the acute economic hardship associated with the pandemic.[20] In the current proceeding, the RD recommends rejecting Columbia's proposed rate increase based on a broader review of all relevant factors and more detailed balancing of the interests.[21] Indeed, the facts and circumstances have evolved since the 2021 decision. Columbia continues to see its annual rate increases as an entitlement and now has the highest distribution rates in the Commonwealth by substantial margins – outpacing inflation and increasing energy insecurity.[22]

Columbia also argues that its rates are "substantially the same as 20 years ago" when considered "on an inflation-adjusted basis."[23] This assertion obfuscates the truth and conflates the total bill with the distribution rate – distorting the period of low commodity prices to mask the impact of its rapidly increasing distribution rates.[24] In reality, Columbia's *distribution* rates for average heating customers (70 therms) have increased 121% - from $47.58 in 2005 to $105.09 in 2025 at proposed rates.[25] Columbia filed twelve rate cases in this time, totaling approved

[17] RD at 117 (citing Tr. at 216-218).
[18] *Id.* at 112-118.
[19] CPA Exceptions at 4-5.
[20] *Pa. PUC v. CPA*, Opinion and Order, Docket No. R-2020-3018835, at 54 (Feb. 19, 2021).
[21] RD at 112-118.
[22] *Id.* at 1; CAUSE-PA MB at 22-26; OCA MB at 27-28; I&E MB at 18-19.
[23] CPA Exceptions at 5.
[24] CAUSE-PA MB at 22-25.
[25] *Id.* at 22-23.

distribution rate increases of more than $487 million.[26] Columbia's unyielding quest to increase revenues is unsustainable and its current proposal would result in unjust and unreasonable rates – especially for low income families that struggle profoundly to maintain basic service to their home.

In balancing the relevant interests, and as explained more thoroughly in CAUSE-PA's Main and Reply Briefs, the Commission should adopt the RD's well-supported recommendation that Columbia's base rate increased be rejected, and deny Columbia's Exception 1 to the RD.

B. Reply to Columbia Exception No. 11: The RD was correct to reject Columbia's egregious fixed residential customer charge proposal because it inappropriately includes indirect costs and undermines key conservation goals and gradualism.

Columbia proposed an eye-popping 85% proposed increase to its residential customer charge, from $17.25 to $31.97, which is designed to recover 99.96% of its proposed residential increase.[27] The RD recommends the Commission reject Columbia's egregious proposal.[28]

Columbia argues that the costs included in its fixed charge proposal do not vary from month to month and falsely asserts that no party has provided evidence to the contrary.[29] Columbia's fixed charge proposal conflates allocation of costs with the design of rates.[30] Consistent with general practice in Pennsylvania and the NARUC Gas Distribution Rate Design Manual, fixed customer charges should only include ***direct*** customer costs, which change with the addition or subtraction of a customer.[31] Columbia's fixed charge proposal includes demand and capacity based charges, uncollectible expenses, and other *indirect* costs which do not change with the addition or subtraction of each customer.[32] As explained in briefing, it appears Columbia backed into its

[26] CAUSE-PA MB at 24
[27] *Id.* at 40.
[28] RD at 396-397.
[29] CPA Exceptions at 18.
[30] CAUSE-PA RB at 16.
[31] CAUSE-PA MB at 42; CAUSE-PA RB at 17; CAUSE-PA St. 2 at 30, n.62; OCA MB at 191 (*citing* OCA St. 4 at 15-16); I&E MB at 62-63; I&E St. 3 at 46; NARUC Gas Distribution Utility Rate Design Manual, at 49-50 (1989).
[32] CAUSE-PA MB at 42.

preferred customer charge based on arbitrary allocation of indirect costs rather than proper isolation of direct costs.[33] Ultimately, there is no direct customer cost basis to support Columbia's proposed $31.97 customer charge and, as such, the RD must stand.

Columbia argues that a higher fixed charge benefits low income customers, which tend to have higher average usage levels.[34] However, as explained in briefing, low income customers rely on the ability to reduce their bill through efficiency and conservation, including participation in LIURP.[35] Every dollar that is locked in to the customer charge undermines the ability of consumers to mitigate the rate increase through conservation, disproportionately impacting low income households and undercut the effectiveness of LIURP.[36]

Columbia asserts that "CAUSE-PA admits that low-income customers are not effectively able to conserve or implement energy conservation measures," citing CAUSE-PA witness Patrick Cicero's direct testimony.[37] This is a mischaracterization of Mr. Cicero's testimony. Mr. Cicero never suggested low income households cannot effectively conserve. To the contrary, he highlighted the difference between *conservation* (behavioral based energy reduction) and *energy efficiency* (installation of efficiency measures) at the evidentiary hearing, and explained that low income households often rely on the ability to reduce their bill through careful conservation.[38] It is true, and CAUSE-PA readily acknowledges, that low income customers often cannot afford energy efficiency measures. However, this fact does not support implementation of higher fixed charges for all residential consumers – it underscores the need to protect the efficacy of LIURP,

[33] CAUSE-PA MB at 43.
[34] CPA Exceptions at 18.
[35] CAUSE-PA MB at 45-47. LIURP stands for the Low Income Usage Reduction Program required to be offered by Columbia as a part of its Universal Service and Energy Conservation Program.
[36] CAUSE-PA MB at 45-47, CAUSE-PA RB at 17.
[37] CPA Exceptions at 21.
[38] CAUSE-PA RB at 18; Hrg. Tr. at 493-494.

which provides no cost energy efficiency measures to low income customers to reduce residential energy bills and improve access to services.[39]

In 2021, the Commission rejected Columbia's proposal to increase its residential customer charge by a far lower margin, finding that the proposal violated the principles of gradualism and key conservation goals.[40] As the Commission explicitly recognized in rejecting Columbia's previous proposal, high fixed charges violate the Commission's policies encouraging energy efficiency and conservation, as it hinders customers' ability to reduce their bill through conservation or energy efficiency measures.[41] Columbia's current $17.25 customer charge is already higher than all other NGDCs and its proposed $31.97 charge is radically out of step with other large NGDCs, a factor the Commission noted when it has rejected a much smaller increase previously advanced by Columbia.[42] As explained more thoroughly in briefing, the RD correctly denied Columbia's proposed $31.97 residential customer charge and should be affirmed.[43]

C. Reply to Columbia Exception No. 12: The RD was correct to recommend discontinuation of Columbia's pilot Weather Normalization Adjustment charge (WNA), as operation of the pilot has proven to be detrimental to consumers – shifting unreasonable business risk to customers and resulting in unjust rates.

In this case, Columbia proposes to make its pilot WNA permanent; however, based on a thorough evaluation of the pilot performance, the RD correctly recommends that it end.[44] The RD explained that the Commission has the authority to allow implementation of alternative rate mechanisms, such as a WNA; however, the utility must provide substantial evidence that the specific mechanism proposed by the utility would result in just and reasonable rates.[45] The RD

[39] CAUSE-PA MB at 45-46; 66 Pa. C.S. § 2202 (universal service and energy conservation); 52 Pa. Code § 58.1.
[40] *Pa. PUC v. CPA*, Opinion and Order, Docket No. R-2020-3018835, at 264-265 (Feb. 19, 2021).
[41] CAUSE-PA MB at 40.
[42] *Id.* at 44-45.
[43] CAUSE-PA MB at 40-47; CAUSE-PA RB at 14-21.
[44] RD at 492-497.
[45] *Id.* at 493.

notes the Commission's formal Policy Statement sets forth 14 factors to aid in this determination, and correctly explains that application of these factors does not alleviate or shift the utility's burden of proof and persuasion.[46] After review of extensive record facts and data, the RD found Columbia did not meet its burden to prove the WNA results in just and reasonable rates.[47]

In Exception 12, Columbia argues that the RD erred by recommending discontinuation of the WNA, and characterizes multiple facts cited in the RD as "misconceptions" about the WNA.[48]

First, it is a fact – not a misconception – that the WNA has operated in a one-sided manner in favor of the Company, "imposing consistent financial burdens on ratepayers while failing to deliver measurable bill stability or balance."[49] The formula may be mathematically bi-directional; however, in practice, the WNA has worked to the detriment of customers, resulting in over $74 million net additional charges to customers for service they did not use.[50] Over the last 6 years, the net charges to customers were more than 16 times larger than the net benefits produced in the first 6 years.[51] Columbia's argument is based on the its own misconception that the Company is entitled to recovery of that $74 million simply because it is part of its authorized revenue requirement. Columbia is not guaranteed recovery of its authorized revenue requirement – merely the reasonable opportunity to recover it – and weather related usage reduction is a traditional business risk of providing gas distribution.[52] All rate setting is based on projections and Columbia is not entitled to assurance during ratemaking that it will be able to recover net revenues, but merely a reasonable

[46] RD at 491
[47] *Id.*
[48] CPA Exceptions at 22.
[49] RD at 493.
[50] CAUSE-PA MB at 50
[51] *Id.* at 53-54.
[52] *Id.* at 58.

opportunity.[53] If Columbia's projections are wrong, it has all the tools that it needs to course correct – including by filing a rate case, which Columbia does almost annually.[54]

Columbia also argues it is a "misconception" that its 3% deadband is not a consumer protection. However, there is no evidence in the record that the deadband has provided meaningful protection for consumers. As explained in the RD, "while some may see the 3% deadband as a customer protection, in reviewing the application of the WNA since being utilized by Columbia, the WNA, as applied by Columbia, did not afford any substantial protection to consumers at all."[55] In reality, Columbia's WNA lacks effective consumer protections. There is no cap on the charge assessed on an individual customer and no backstop to prevent excessive individual charges.[56] Columbia's WNA does not exempt any low income customers, thus exacerbating energy insecurity and driving up the cost of CAP for other residential customers.[57]

Columbia further argues that it is a "misconception" that the WNA is not rooted in the cost of service.[58] However, by charging customers more through the WNA when usage is low, the Company is requiring customers to pay for services they did not use, which stands in direct opposition to cost of service and cost causation principles.[59] Columbia's argument assumes that Columbia is entitled to recover an approved revenue requirement regardless of the customer usage due to variations in weather, even though Columbia is in a weather intensive business.[60]

Columbia argues that the RD ignores the fact that "abnormal warming weather conditions exist" – and submits that these abnormal conditions are outside the Company's control and justify

[53] CAUSE-PA MB at 58; *Federal Power Comm'n v. Hope Natural Gas Co*., 320 U.S. 591, 603 (1944); *Pa. Elec. Co. v. Pa. PUC*, 502 A.2d 130, 133-35 (Pa. 1985).
[54] CAUSE-PA MB at 59.
[55] RD at 493.
[56] CAUSE-PA MB at 74.
[57] *Id.* at 74-75.
[58] CPA Exceptions at 23.
[59] RD at 490; CAUSE-PA MB at 60-61.
[60] CAUSE-PA MB at 60.

imposition of the WNA.[61] As explained in briefing, the warming trends we are experiencing are not "abnormal" and there is no evidence in this case suggesting that the trend of heating degree days will regress to a mean.[62] The RD acknowledges weather is warming but correctly explains that changing weather is a normal business risk of providing gas service.[63] By shifting the risk of warming weather to consumers, the WNA insulates Columbia from traditional business risk and, in turn, erodes incentive for disciplined and efficient management performance.[64]

Columbia also argues that it is a "misconception" that the WNA has not provided a credit in the past five heating seasons and points out that the WNA provided a net credit in four of the first six years it was enacted.[65] There is no misconception – the facts speak for themselves. In the last six years, the WNA has resulted in $78.9 million in net additional charges to customers and no years with a net credit to customers.[66] These net charges are more than 16 times higher than the net credits referenced by Columbia in the early years of the WNA's implementation.[67] Columbia's WNA, in its current form, is substantially different than the WNA it operated in the first six years, following Columbia's decrease in the deadband from 5% to 3% after the 2018/2019 heating season.[68] It is also clear that that Columbia's projections of "normal" weather over that time have not matched actual weather sufficiently to create a bi-directional benefit.[69]

Columbia argues its WNA should be approved because it is similar to the WNA recently approved for Peoples Gas.[70] Peoples' WNA was approved as part of a non-unanimous settlement,

[61] CPA Exceptions at 23.
[62] CAUSE-PA RB at 25.
[63] RD at 490-491.
[64] CAUSE-PA MB at 54.
[65] CPA Exceptions at 24.
[66] *Id.* at 53.
[67] *Id.*
[68] *Id.* at 54.
[69] *Id.*
[70] CPA Exceptions at 24.

which included a number of critical negotiated concessions and compromise.[71] There is no settlement agreement in this case. Also, unlike this case, Peoples did not have a WNA when its proposal was approved, so there was no data to evaluate how Peoples' WNA would operate.[72]

Columbia also opposes the RD's alternative recommendations to modify the WNA if the Commission ultimately approves its continuation.[73] CAUSE-PA supports the RD's recommendation to reject the WNA; however, if the Commission allows the WNA to go forward it must impose substantial reforms to protect consumers from unjust and unreasonable charges.[74] Columbia argues it would be confusing to customers to make changes to the currently effective WNA.[75] This claim is not credible. Columbia has not demonstrated that making changes to the WNA would add any more confusion than is already created by the multi-step, multivariable algebraic equation required to calculate the WNA.[76] Further, Columbia's offer to forgo application of the WNA in May is insufficient to address the host of problems with Columbia's WNA that have detrimentally impacted consumers and it is inappropriate for Columbia to raise such an alternative at this late stage in the proceeding. As explained more thoroughly in briefing, CAUSE-PA urges the Commission to affirm the recommendation in the RD to discontinue the complex, one-sided pilot WNA, as it produces patently unjust and unreasonable rates.[77]

D. Reply to Columbia Exception No. 13: The RD is correct to reject Columbia's proposed EDDS rate, as it is premature and exposes existing customers to risk.

The RD recommends rejection of Columbia's proposal to implement Rate Economic Development Distribution Service (EDDS) to allow it to serve large load customers such as data

[71] CAUSE-PA RB at 22-23.
[72] *Id.* at 23.
[73] CPA Exceptions at 25.
[74] CAUSE-PA MB at 79-81.
[75] CPA Exceptions at 25.
[76] CAUSE-PA MB at 54.
[77] *Id.* at 50-81; CAUSE-PA RB at 21-31.

centers as nonjurisdictional customers.[78] The RD explains this proposal is premature given the Commission's active proceeding to develop statewide policy for large load customers.[79]

In Exception 13, Columbia argues the statewide proceeding is focused on electric interconnection, and that gas interconnection presents different and unique issues.[80] Columbia argues it should not have to wait for the outcome of this statewide proceeding.[81] This argument is speculative considering Columbia has only had a single inquiry from a potential customer.[82] While the Commission's primary inquiry in the statewide proceeding has been focused on the electric industry, the results of Commission's proceeding will provide guidance for all jurisdictional utilities seeking to implement large load rates or tariffs, including fair rules and procedures that provide transparency to new customers, protection for existing customers to prevent cost shifting, and certainty to utilities themselves.[83] CAUSE-PA agrees with the RD that, based on the scale of the investment and the risk of cost shifting between jurisdictional and non-jurisdictional customers, Columbia's existing customers will be better served by waiting for the Commission's guidance before implanting a Rate EDDS.[84]

E. Reply to Columbia Exception No. 14: The RD is correct to require Columbia to improve education for its low income shopping customers consistent with its obligations under the Choice Act.

Extensive data in this case reveals that residential shopping customers are charged substantially higher rates and that low income shopping customers face substantially higher rates of involuntary termination – inflating bills, exacerbating energy insecurity, and driving up

[78] RD at 646-647.
[79] *Id.* at 647.
[80] CPA Exceptions at 26.
[81] *Id.*
[82] CAUSE-PA MB at 155-156.
[83] CAUSE-PA RB at 66.
[84] RD at 647; CAUSE-PA RB at 66.

collections and universal service costs.[85] CAUSE-PA and OCA advanced similar recommendations that the Commission require Columbia to educate its residential and low income shopping customers about the competitive market and the availability of rate assistance through CAP.[86] The RD agreed with and adopted the recommendations of CAUSE-PA and OCA.[87]

In Exception 14, Columbia argues that requiring the Company to educate customers about the competitive market and the availability CAP "conflicts with the intent of the Competition Act" – and asserts that the purpose of the Choice Act is not to lower costs.[88] Columbia is wrong. The overarching goal of the Choice Act is to promote competition through deregulation of the energy supply industry, leading to reduced energy costs for consumers – not unbridled competition.[89] The Choice Act contains numerous requirements intended to balance a multitude of interest and provides the Commission with the authority to effectively limit competition "so that other important policy concerns of the General Assembly, such as access, *affordability*, and cost-effectiveness, may be served."[90] Of relevance here, the Choice Act defines "universal service and energy conservation programs" as inclusive of the "[p]olicies, practices, and services that help residential low-income retail customers *…to maintain natural gas supply and distribution services*" and requires the Commission to ensure programs are "available in each natural gas distribution service territory"[91] to, *inter alia*, "*assist low-income retail customers to afford natural gas service*."[92] In short, the Act explicitly acknowledges that the ability of low income customers to both *afford* and *maintain* gas service to their home is of paramount concern and imposes a direct

[85] CAUSE-PA MB at 146-148.
[86] *Id.* at 148-149; OCA St. 1 at 60.
[87] RD at 622-626.
[88] CPA Exceptions at 27
[89] CAUSE-PA MB at 151; *Retail Energy Supply Assoc v. Pa. PUC*, 230 C.D. 2017 (Pa. Commw. Ct. 2017); *CAUSE-PA v. Pa. PUC*, 120 A.3d 1087, 1101 (Pa. Commw. Ct. 2015).
[90] CAUSE-PA MB at 151-152.
[91] CAUSE-PA RB at 63; 66 Pa. C.S. § 2203 (8) (emphasis added).
[92] CAUSE-PA RB at 63; 66 Pa. C.S. §§ 2202; 2203 (7) (emphasis added).

obligation on Columbia to operate programs to address these key imperatives. In addition to universal service obligations, the Choice Act requires NGDCs to educate consumers about the competitive market and to provide "*adequate and accurate information necessary to help them make appropriate choices as to their natural gas service*."[93]

The evidence in this proceeding clearly reveals that Columbia's consumer education is inadequate to support consumer choice, and its policies and practices are not adequately assisting low income shopping customers to maintain service to their home.[94] In the first three months of 2025, residential and low income shopping customers were charged in the aggregate over $11 million in excess of the price to compare – equating to more than $63 in additional charges per customer over the PTC each month.[95] In 2024, the involuntary termination rate for Columbia's low income shopping customers topped 25%, compared to 14% for low income default service customers.[96] It is unacceptable, and contrary to the explicit mandates of the Choice Act, that 1 in 4 of Columbia's low income shopping customers are categorically unable to afford to maintain service to their home. Something must be done to reverse this dangerous, life threatening outcome.

Columbia argues that the lack of NGS participation in this proceeding should prevent the Commission from ordering Columbia to educate its low income shopping customers.[97] This argument is patently absurd. Whether a third party intervenes in Columbia's rate case is irrelevant to determining whether Columbia is meeting its statutory obligations to educate consumers about the competitive market and ensure low income customers can afford and maintain gas service.[98]

[93] CAUSE-PA MB at 151; 66 Pa. C.S. § 2206 (c), (d) (emphasis added).
[94] CAUSE-PA MB at 151-152.
[95] *Id.* at 146.
[96] *Id.* at 147.
[97] CPA Exceptions at 28.
[98] CAUSE-PA RB at 64.

Columbia argues that it "has no desire to interfere with its low-income customers' shopping choices" and that low-income customers have many reasons why they choose to shop - even if it results in higher charges or termination.[99] Columbia's argument reflects the Company's general disregard for ensuring that its low income customers have adequate information to make informed decisions about their supply so they can remain connected to service, and should not carry weight.

Finally, Columbia argues the RD lacks clarity regarding adoption of OCA and CAUSE-PA's proposals and notes Ordering Paragraph 39 only mentions CAUSE-PA's recommendation.[100] CAUSE-PA strongly supports both recommendations, which are independently supported by substantial record evidence and the well-reasoned decision of the ALJs in this proceeding. While the Ordering may be unclear in this respect, the evidence of harm is unambiguous. Columbia must improve education of its residential and low income shopping customers.

F. Reply to Columbia Exception No. 15: The RD is correct to require Columbia to implement routine screening to help improve its low CAP enrollment rate.

Columbia's CAP is a statutorily required program that provides crucial rate relief proven to reduce collections costs and termination rates; however, Columbia's CAP is nevertheless severely undersubscribed – reaching just 23% of estimated eligible customers.[101] CAUSE-PA and OCA recommended that the Commission require Columbia to implement an enhanced screening and enrollment process. In support, CAUSE-PA and OCA explained that improved identification and referral of eligible households to available assistance is not only good policy, it is necessary to fulfill Columbia's statutory obligation to ensure customers receive the most advantageous rate – and its universal service obligations to help low income customers maintain service to their

[99] CPA Exceptions at 28.
[100] *Id.* at 27-28.
[101] CAUSE-PA MB at 101-103.

home.[102] The RD agreed, concluding: "[i]mproved screening and referrals could help ensure households are receiving the most advantageous available rate and is a statutory requirement."[103]

In Exception 15, Columbia opposes this recommendation, arguing it would "require the Company to implement procedures to retrieve income verification from its customers during virtually every customer interaction and establish new methods for screening for income through a customer's online account portal."[104] This is a gross exaggeration. CAUSE-PA never suggested that Columbia verify income of every caller. A brief inquiry asking whether the household has trouble affording their bill and making appropriate referrals for further screening would not likely add appreciable time to calls.[105] While there may be minor upfront costs to implement new call scripts, Columbia is likely to save money on CAP outreach in the long term.[106]

Proactive CAP enrollment strategies, such as routine screening, serves as a critical collection and cost containment tool that helps *prevent* the accrual of unmanageable debts and associated collections costs and, in turn, will reduce the cost of CAP.[107] As Columbia witness Davis acknowledges in her rebuttal testimony, "arrears amassed prior to entry into CAP are paid by all non-CAP residential customers."[108] By accelerating CAP enrollment, "less arrears will be amassed that need forgiven."[109] Maximizing CAP enrollment through proactive inquiry seeks to improve payment behavior, reduce terminations and uncollectible expenses paid by customers.[110]

[102] CAUSE-PA MB at 109-112; OCA MB at 305-309; 66 Pa. C.S. §§ 2202, 2203, 1303.
[103] RD at 547.
[104] CPA Exceptions at 28-29.
[105] CAUSE-PA MB at 111-112.
[106] *Id.*
[107] *Id.* at 110.
[108] *Id.* at 111; CPA 16-R at 20.
[109] CAUSE-PA MB at 111.
[110] *Id.*

G. Reply to Columbia Exception No. 17: The RD correctly prohibits Columbia's disclosure of sensitive customer data included on the Eligible Customer List to third parties that are not licensed as supplier.

Columbia's tariff language regarding the disclosure of private customer information included on its Eligible Customer List (ECL) is unduly broad, allowing the Company to provide sensitive data and information to any third party – based solely on a customer's failure to affirmatively opt out.[111] CAUSE-PA and OCA urged amendment of Columbia's ECL tariff language, section 4.5.4, to strike reference to third parties, and limit ECL access to licensed suppliers in Columbia's service territory.[112] The RD adopts this recommendation.[113]

In Exception 17, Columbia argues the disputed language is in its existing tariff, and cites section 62.78 of the Commission's regulations to support its contention that it can share private customer information included on the ECL with any third party.[114] Columbia's argument ignores the plain definition of "customer information", which is defined in section 62.72 as "[w]ritten, oral or electronic communications *used by natural gas providers* to communicate to consumers prices and terms of service."[115] Columbia also ignores the explicit purpose of the chapter, delineated in section 62.71, "to require that all *natural gas providers* enable customers to make *informed choices regarding the purchase of all natural gas services* offered by providing adequate and accurate customer information."[116] Contrary to Columbia's assertion, neither the Choice Act nor the Commission's regulations contemplate sharing private customer information from the ECL with third parties for purposes other than supporting customer choice for natural gas services.

[111] CAUSE-PA MB 156-160.
[112] *Id.*
[113] RD at 647-648.
[114] CPA Exceptions at 31-32.
[115] 52 Pa. Code § 62.72 (emphasis added).
[116] 52 Pa. Code § 62.71 (emphasis added).

Columbia argues the Commission "clearly contemplated that third parties other than NGSs might have access to the information supplied [in the ECL]," and cites a provision of the Commission's March 13, 2025 Order that cautions "NGSs, [and] other marketers and agents" about federal do not call laws.[117] When read in context with the broader order, this language clearly references the marketers and agents contracted by licensed NGSs to market their products, and does not give carte blanche to NGDCs to share private customer information with any third party.

At the evidentiary hearing in this matter, Mr. Kempic admitted that Columbia interprets its ECL tariff to permit the Company to share ECL data with ***any*** third party, regardless of whether they are licensed as an NGS.[118] Columbia's broad interpretation is particularly troublesome in light of its June 30, 2025, filing at its 2018 rate case docket notifying the Commission of its intent to allow third parties to bill for non-utility services on Columbia's bill.[119] For an additional fee, Columbia will provide third parties with access to private customer information.[120] CAUSE-PA is strongly opposed to the use of the ECL for these purposes. As explained in its Main Brief, the ECL was recently expanded to identify low income status, which heightens the risk of harm by exposing economically vulnerable households to targeted marketing for products unrelated to gas service.[121]

For the reasons explained above and more thoroughly in briefing,[122] Columbia's Exception 17 should be denied, and Columbia should be ordered to amend its tariff to limit disclosure of its ECL to licensed NGSs consistent with the Choice Act and Commission regulations.

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[117] CPA Exceptions at 32.
[118] CAUSE-PA MB at 157; Tr. at 406: 1-19.
[119] At the evidentiary hearing in this matter, ALJs Watson and Allensworth took official notice of Columbia's recent filings at Dockets R-2018-2647577 and G-2025-3056022. Tr. at 406: 6-9 & 412: 17-21. Pursuant to the ALJ's request, counsel for CAUSE-PA circulated the noticed documents to the ALJs and all parties via email. Pursuant to 52 Pa. Code § 5.406, these publicly available documents were not reproduced for the record.
[120] *Columbia Gas of Pa., Inc. Revised Notice of Compliance*, Docket No. R-2018-2647577, at 2 (filed June 30, 2025).
[121] CAUSE-PA MB at 158-159.
[122] *Id*. at 146-154; CAUSE-PA RB at 62-65.

H. Reply to Columbia Exception 19: The RD was correct to reject Columbia's proposed Phase II Energy Efficiency and Conservation (EE&C) Plan because it lacks dedicated and proportionate low income programming – a basic requirement for all ratepayer funded EE&C plans.

Through its rate filing, Columbia proposes extending and expanding its self-initiated EE&C Pilot into a Phase II, three-year EE&C Plan. CAUSE-PA supports EE&C programs that provide dedicated, proportionate access to low income customers. However, Columbia's Phase II proposal fails to follow Commission guidance and best practices to ensure low income customers can equitably and proportionately access Columbia's Phase II EE&C programs, even though these customers pay for the programs through rates.[123] Columbia did not include any dedicated low income programming as part of its Phase II EE&C Plan – nor has it proposed to expand contributions to its Audits and Rebates Budget (A&R) and Emergency Repair Programs (ERP) programs to ensure equitable and proportionate services for low income households.[124] It is fundamentally unjust and unreasonable to require low income households to pay for programs that don't provide specific, proportionate low income measures.[125]

The RD agrees with CAUSE-PA and recommends rejection of the Phase II EE&C Plan.[126] The RD explains that the Phase II Plan does not include dedicated low income programming and that Columbia has not proposed to adjust its prior settlement obligations to account for the lack of proportional treatment of low income customers.[127] The RD also adopts CAUSE-PA's alternative recommendation that, if the Commission ultimately approves the Phase II EE&C Plan, Columbia should be required to proportionately increase funding for its separate A&R and ERP programs.[128]

[123] CAUSE-PA MB at 135-142.
[124] *Id.* at 136.
[125] *Id.* at 142.
[126] RD at 609
[127] *Id.*
[128] *Id.* at 610; CAUSE-PA MB at 143-145.

In Exception 19, Columbia opposes the RD's recommendation and argues that it should be allowed to implement its Phase II EE&C Plan despite the lack of dedicated low income programming.[129] Columbia argues that there is no regulation, order, or policy statement requiring that voluntary gas EE&C plans include dedicated low-income programming.[130] This point is fully addressed through briefing.[131] In short, there is currently no explicit statutory or regulatory authorization for ratepayer funded NGDC EE&C plans in Pennsylvania.[132] Thus, the Act 129 requirements for Pennsylvania EDCs provide a critical touchstone for evaluating the justness and reasonableness of the design and implementation for ratepayer supported efficiency programming.[133] Indeed, Columbia ostensibly recognizes this fact, as it cites to Act 129 as general support for its EE&C Plan – though it selectively ignores a central feature of the Act designed to ensure low income households are equitably served.[134]

Act 129 requires that EDCs offer dedicated, proportional low income programming *in addition* to that offered under their respective LIURPs.[135] Act 129 provides that EDC EE&C Plans "shall include specific energy efficiency measures for households at or below 150% of the Federal poverty income guidelines."[136] The Act further provides: "The number of measures shall be proportionate to those households' share of the total energy usage in the service territory."[137] All Pennsylvania EDCs offer dedicated low income programming, in line with the Commission's current Phase IV requirements.[138] Likewise, other gas EE&C plans in Pennsylvania, such as those

[129] CPA Exceptions at 34.
[130] *Id.*
[131] CAUSE-PA MB at 137-140; CAUSE-PA RB at 58-61.
[132] I&E St. 2 at 92-94.
[133] CAUSE-PA St. 1-SR at 6.
[134] CPA Exceptions at 34; 66 Pa. C.S. § 2806.1 (b)(1)(i)(G).
[135] CAUSE-PA MB at 137-138; 66 Pa. C.S. § 2806.1 (b)(1)(i)(G)..
[136] CAUSE-PA MB at 137-138; 66 Pa. C.S. § 2806.1(b)(1)(i)(G) (emphasis added).
[137] CAUSE-PA MB at 139; 66 Pa. C.S. § 2806.1(b)(1)(i)(G)
[138] CAUSE-PA MB at 139.

offered by Philadelphia Gas Works' (PGW) and UGI Utilities, Inc. – Gas Division's (UGI) provide specific low income measures as part of their plans.[139] Attempting to have it both ways, Columbia argues that, while it relies on Act 129 standards to support the approval of its EE&C program, it is not required to offer low income programs because it is not subject to the Act 129 statute.[140]

Columbia also attempts to rely on a December 23, 2009 Secretarial Letter directed at *small electric distribution companies* ("EDCs") to file voluntary EE&C Plans.[141] To state the obvious: Columbia is neither an EDC nor is small. In explaining the additional flexibility provided to EE&C plans run by "small EDCs" the Commission explained, "[W]e recognize that the Act 129 program contains a complexity and comprehensiveness that may not be appropriate for small EDCs, due to the costs of such programs that must be supported by a smaller customer base."[142] The secretarial letter refers to "small EDCs" as, "EDCs with fewer than 100,000 customers" who were exempted from the requirement to file an Act 129 EE&C plan, due to the costs of such programs that must be supported by a smaller customer base."[143] However, Columbia has more than four times that number of residential customers and has nearly 100,000 estimated low income customers, approximately 70,0000 of whom are not enrolled in CAP and pay EE&C costs through rates.[144]

Columbia argues that low-income customers benefited from Phase I, noting 580 low income customers were referred to other programs and 180 participated directly in its Residential Prescriptive ("RP") Program.[145] These statistics do not reflect proportionate participation in its EE&C programs: The 180 CLI customers who participated in Columbia's RP represented only

[139] CAUSE-PA MB at 139.
[140] CPA Exceptions at 34, 36.
[141] *Id*. at 36, *citing Re: Voluntary Energy Efficiency and Conservation Program*, Docket No. M-2009-2142851 (Dec. 23, 2009) ("*Small EDC EE&C Letter*").
[142] *See Small EDC EE&C Letter,* M-2009-2142851, at p. 2.
[143] CAUSE-PA RB at 59-60; *Small EDC EE&C Letter,* M-2009-2142851, at p. 1.
[144] CAUSE-PA RB at 60.
[145] CPA Exceptions at 36

approximately 5% of the 3,888 RP participants in Phase I, despite the fact that CLI customers represent 17% of Columbia's residential customers.[146] Columbia did not provide evidence of the services provided to these 180 participating households. There is also no evidence that any of the 550 referrals were actually able to participate in any other low income programs following Columbia's referral.[147] In fact, this figure includes households with income up to 250% of the federal poverty level, which is much higher than the income threshold for most programs.[148]

Not only has Columbia failed to serve low income customers proportionately through its Phase I EE&C, it has also failed to spend approximately $500,000 in A&R and ERP program funds intended to address Columbia's lack of low income programming within its Phase I EE&C.[149] In defense of its underspending within the A&R and ERP programs, Columbia attempts to make an unsubstantiated argument that its underspending was "within normal spending limits," without any further explanation.[150] Over the past three years, Columbia has left $469,156 A&R funds and $32,433 in ERP funds unspent and has failed to roll any of those unspent funds into the budget for future years.[151] These funds could and should have been used to provide efficiency services to 130 additional low income households and emergency furnace assistance to at least 9 additional households.[152] The RD correctly finds this underspending undercuts prior settlement provisions meant to address Columbia's lack of dedicated low-income EE&C programming and was correct to order that Columbia begin carrying over unspent funds to the following program year.[153]

[146] CAUSE-PA MB at 140-141.
[147] *Id.* at 141.
[148] CPA Exceptions at 36.
[149] CAUSE-PA MB at 132-134.
[150] CPA Exceptions at 37-38.
[151] CAUSE-PA MB at 132, 134.
[152] *Id.* at 132, 134.
[153] RD at 609.

It is fundamentally unreasonable to require low income households to pay for programs that do not include specific, proportionate low income measures.[154] Columbia's self-initiated, ratepayer funded EE&C Plan should be held to the same basic standards as the statutorily authorized EE&C programs run by other large Pennsylvania utilities, including just and equitable treatment to its low income customers.[155] If Columbia is unable or unwilling to operate its EE&C Plan according to these standards and best practices, the plan should be rejected.[156] Notably, the RD recommends rejecting Columbia's EE&C without prejudice, meaning that Columbia is free to reintroduce its Phase II EE&C Plan with dedicated, proportionate low income programming in compliance with the Commission's standards and best practices.

I. Reply to Columbia Exception 20: The RD's Ordering Paragraphs regarding CAUSE-PA's recommendations are supported by substantial evidence and should be approved.

In Exception 20, Columbia excepts broadly to multiple ordering paragraphs (OPs) based on an alleged lack of support.[157] There is substantial evidence in the record and the RD to support each of these ordering paragraphs.

OP 11 reflects one element of the improved screening process recommended by OCA, CAUSE-PA, and adopted in the RD.[158] Columbia argues that this OP is duplicative; however, the requirement that these customers be flagged as confirmed low income does not appear in the other OP regarding the improved CAP screening process.[159]

OP 34, 35, and 41 adopt CAUSE-PA's recommendations to improve Columbia's proposed CAP Arears Pilot. While these OPs do not directly align with the language referencing the Pilot

[154] CAUSE-PA MB at 142.
[155] *Id.* at 139.
[156] *Id*.
[157] CPA Exceptions at 39.
[158] RD at 681; CAUSE-PA MB at 109-112; OCA MB at 305-309.
[159] RD at 683-684, OP No. 30.

earlier in the RD, the record in this proceeding demonstrates the necessity of increasing the budget and timeline for the Pilot, and for targeted outreach.[160] We urge the Commission to affirm the directives in the OP to improve Columbia's CAP Arrears Pilot – ensuring adequate pilot data for evaluation in Columbia's next USECP.

OP 36 reflects CAUSE-PA's recommendation that Columbia update its Universal Service and Conservation to reflect the Company's commitment to reevaluate CAP bills monthly to ensure customers receive the most affordable rate.[161] This modification is necessary to ensure Columbia's USECP accurately reflects Columbia's practice.[162]

OP 37 and 38, regarding Columbia's A&R and ERP, reflect CAUSE-PA's recommendation that the Commission require Columbia to rollover any unspent A&R Program and ERP budgets at the end of each program year and add those unspent funds to the budget for the following year.[163] Columbia mischaracterizes these as alternative recommendations.[164] CAUSE-PA's proposal that Columbia roll over unspent A&R and ERP funds to the budget for the following year was intended to address chronic underspending within these programs, and was not tied to the Phase II EE&C alternatives.[165] Through briefing, and as addressed in response to Exception 19 above, CAUSE-PA explained that the ability to carry-over unspent funds would provide Columbia with greater flexibility year over year when costs are not directly on target and would help prevent the steady erosion of funding to support the critical needs served by the A&R and ERP programs.[166] Thus, there is substantial evidence to support the RD's finding that

[160] CAUSE-PA MB at 115-118.
[161] *Id.* at 118-119.
[162] CAUSE-PA RB at 44-45.
[163] CAUSE-PA MB at 131-135.
[164] CPA Exceptions at 40.
[165] CAUSE-PA MB at 133, 134.
[166] *Id.* at 132-133, 135.

Columbia should be required to rollover its unspent ERP budget and add those unspent funds to the budget for the following year regardless of whether the Phase II EE&C plan is approved.

III. CONCLUSION

For the reasons stated above, CAUSE-PA respectfully asserts that the Commission should reject Columbia's Exceptions and affirm the ALJ's Recommended Decision without amendment.

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