



January 27, 2026

VIA E-File

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

Re: Amended Petition of Peoples Natural Gas Company, LLC to Amend
Its Current Universal Service and Energy Conservation Plan 2019-2024.
Docket Nos. P-2024-3052324, M-2018-3003177, M-2020-3021314

CAUSE-PA Answer to Amended Petition

Dear Secretary Homsher:

Please find attached **the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) Answer to Amended Petition**, which is respectfully submitted for filing in the above noted proceeding.

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L.N. Berman", with a horizontal line extending to the right.

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

CC: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024	:	Docket No. M-2018-3003177
	:	
	:	
Peoples Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024	:	Docket No. M-2020-3021343
	:	
	:	
Petition of Peoples Natural Gas Company LLC to Amend 2019-2024 Universal Service and Energy Conservation Plan	:	Docket No. P-2024-3052324
	:	

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY
IN PENNSYLVANIA (CAUSE-PA) ANSWER TO AMENDED PETITION**

PENNSYLVANIA UTILITY LAW PROJECT

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I. INTRODUCTION

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.61-5.76, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA), through its legal counsel at the Pennsylvania Utility Law Project (PULP), hereby files the foregoing Answer to the Amended Petition of Peoples Natural Gas Company LLC to Amend Its Current Universal Service and Energy Conservation Plan in the above-captioned proceeding.

For more than ten years, the LIHEAP Advisory Committee (LAC) to the Department of Human Services (DHS), which includes representatives from the Commission’s Bureau of Consumer Services, has worked collaboratively to develop a data sharing policy permitting the exchange of detailed household income and household composition data for the express purpose of streamlining enrollment in utility-run assistance programs.¹ DHS launched the policy in Fall 2024.

On June 13, 2024, consistent with the consensus-based recommendations included in the March 2024 Universal Service Working Group Report,² the Commission issued an Order encouraging energy utilities to participate in the DHS data sharing program.³ The Commission set forth a number of temporary and partial waivers designed to “relieve an energy public utility from the obligation to file and serve a petition to amend its existing USECP” to implement various procedures utilizing LIHEAP data to streamline enrollment and recertification.⁴ While the Order addressed certain pre-approved data policies, it did not foreclose

¹ Members of the LAC include a broad range of stakeholder interests, including representatives from the PUC, the Energy Association of Pennsylvania, and the Office of Consumer Advocate.

² Pa. PUC, Universal Service Working Group Report, Docket No. M-2023-3038944 (March 2024).

³ 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Order, Docket No. M-2023-3038944 (June 13, 2024).

⁴ Id.

the ability of an energy utility to petition the Commission for approval to implement other data sharing policies.

In October 2024, DHS began sharing data with the utilities pursuant to the data sharing agreement. On December 18, 2024, DHS identified a technical issue with the data and advised utilities not to rely on the data until the technical issues were resolved.⁵ DHS addressed the technical issues and restarted the data exchange on July 14, 2025.⁶

Using language developed through consensus recommendations from the LAC, LIHEAP applicants are affirmatively asked whether they wish to allow DHS to share their income and household data with the applicant’s utility “to help enroll your household in a utility or energy assistance program.”⁷ This section of the LIHEAP application provides, in full⁸:

Do you want DHS to share information from your application with your utility to help enroll your household in a utility or energy assistance program? Yes No

Many Pennsylvania gas and electric utilities offer programs that help low-income customers reduce monthly bills, save energy, and eliminate past-due balances. DHS can share information from your application with your utility, including your income and household members (such as names and dates of birth) to help you enroll in these programs if you want us to share it. Your information will be kept confidential.

This is optional. You can get a LIHEAP grant if you qualify even if you do not want DHS to share your information with your utility.

The income and household data relied upon by DHS to determine LIHEAP eligibility, and subsequently shared with the utility company, includes the household’s current, verified income and household documentation - shared with the explicit consent of the applicant.

The importance of this data sharing process is underlined by data presented through the course of Peoples 2023 Rate Case, from which the instant Amended Petition arises. In that

⁵ December 18, 2024 Email from DHS to the LIHEAP Advisory Committee.

⁶ LIHEAP Advisory Committee, August 2025 LAC Meeting Minutes (approved Nov. 19, 2025).

⁷ LIHEAP Application – PY 2025-2026, Q.17.

⁸ Id.

proceeding, CAUSE-PA highlighted data showing that Customer Assistance Program (CAP) enrollment substantially improves collections and termination rates and raised deep concerns about the chronic under-enrollment in CAP and the troubling 13% decline in Peoples' CAP enrollment since 2019.⁹ Data presented in that proceeding also clearly demonstrated that enrollment in CAP is a significant factor driving reduced collections and terminations. For example, in 2023, Peoples' CAP termination rate was just over 5%, compared to 12% for low income customers not enrolled in CAP. Further, in 2023, despite comprising only 7.9% of residential customers, confirmed low income customers accounted for 17.4% of Peoples' involuntary terminations.¹⁰

Through this Amended Petition, Peoples is attempting to fulfill the purpose of years of dedicated work by both the LAC and DHS, as outlined above. As stated clearly by Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss in a Joint Statement:

LIHEAP data sharing promotes efficiencies and eliminates paperwork redundancies by allowing customers, who are eligible for LIHEAP, to enroll or recertify in energy utilities' universal service programs without submitting new applications. ... **These improvements will result in cost savings and reduce 'red tape' bureaucracy to the benefit of customers and energy utilities alike.**¹¹

Peoples' proposal will serve a critically needed preventative role to help address the growing number of struggling consumers, easing their enrollment in CAP to improve payment coverage and frequency rates, thereby reducing attendant uncollectible expenses and other far-ranging consequences of utility insecurity. Utilizing LIHEAP data to automate CAP enrollment is a common-sense solution to help alleviate rising energy insecurity for low income households,

⁹ Pa PUC v. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549, Main Brief of CAUSE-PA at 22-28.

¹⁰ Id. at 16.

¹¹ 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Joint Statement of Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss, Docket No. M-2023-3038944 (June 13, 2024) (emphasis added).

while at the same time helping cut down on unnecessary, costly, and duplicative administrative processes. It is essential that the Commission swiftly approve Peoples Amended Petition, so that it may implement auto-enrollment for LIHEAP recipients who have already affirmatively indicated their desire to enroll in utility-run assistance programs, provided consent to share detailed income and household data with Peoples for this purpose, and demonstrated their eligibility for the program by completing the rigorous LIHEAP application process.

II. BACKGROUND

As consideration for not opposing the Joint Petition for Nonunanimous Settlement in the aforementioned rate case, CAUSE-PA agreed to enter into a Stipulation with Peoples which, *inter alia*, required the Company to file a Petition with the Commission within 90 days after entry of a Final Order in that proceeding seeking authorization to amend its 2019 USECP to do the following:

- “initiate autoenrollment of LIHEAP recipients with significant balances into Customer Assistance Program (CAP),
- permit auto-recertification, and
- waive income documentation requirements for CAP applicants who have received [a Low-Income Home Energy Assistance Program (LIHEAP) grant] in the last two years.¹²”

Peoples also agreed in the Stipulation, to retain its longstanding tariff provision regarding LIHEAP auto-enrollment, with minor amendment to eliminate the requirement that a household default on a payment arrangement and to clarify that auto-enrollment should be targeted to LIHEAP recipients with a significant account balance.¹³

The Commission issued its Final Order on September 12, 2024, approving the Stipulation as filed, and specifically noting that the “agreement serves important benefits to the public interest and reflects agreement between the Company and the parties who were not part of the Joint Petition [for Settlement] and the Company’s voluntary efforts to enhance service and protections to its

¹² *Id.*, Low Income Stipulation (Filed May 30, 2024) at I.A.6; (Final Order issued September 12, 2024).

¹³ *Id.*, Low Income Stipulation at I.B.15.

customers.”¹⁴ Peoples filed its amended tariff with the Commission on September 26, 2024, reflecting the agreed-to changes.

On December 11, 2024, Peoples filed its Petition seeking authorization to initiate auto-enrollment of LIHEAP recipients with significant balances into its CAP, to permit auto-recertification, and to waive income documentation requirements for CAP applicants that have received LIHEAP in the last two years. On April 24, 2025, the Commission rejected Peoples’ Petition (April 2025 Order), without prejudice, citing concerns with multiple aspects of Peoples’ proposal. On May 9, 2025, CAUSE-PA filed a Petition for Reconsideration arguing, in relevant part, that the Commission overlooked key factual basis for Peoples’ Petition to Amend its USECP, and asked the Commission to reconsider its denial and instead require Peoples to collaborate with stakeholders and file a further amended Petition to address the concerns identified in the Commission’s April 2025 Order.

On October 9, 2025, the Commission issued its Order on Reconsideration, granting partial reconsideration of its April 2025 Order. (October 2025 Order). In relevant part, the Commission agreed with CAUSE-PA “that Peoples USECP must align with its approved tariff” and directed Peoples “to consult with interested stakeholders and submit an amended Petition to Amend its USECP within 90 days of the entry date of this Order that addresses the Commission’s concerns as cited in the April 2025 Order and that aligns with its approved tariff.”¹⁵

After soliciting extensive input from CAUSE-PA and other stakeholders through its USAC, Peoples timely filed its Amended Petition on January 7, 2026.

III. ANSWER

1. Admitted.

¹⁴ *Id.*, Final Order at 62.

¹⁵ October 2025 Order at 7.

2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted. CAUSE-PA strongly supported Peoples Petition to align its policies with its approved tariff and filed its Letter in Lieu of Answer December 20, 2024.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted
12. Admitted
13. Admitted.
14. Admitted.

By way of further Answer, CAUSE-PA notes that one of the Commission’s concerns regarding Peoples’ initial Petition rested on its erroneous and unsupported assertion that Peoples’ proposal “seeks to auto-enroll or auto-recertify customers in CAP based on possibly out-of-date or unverified income or household information.”¹⁶ This assertion is based on its earlier claim that “DHS has informed the Commission and other members of DHS’s LIHEAP Advisory Committee that income used to determine a household’s LIHEAP eligibility could be up to two years old for recipients of some public benefits (e.g., Medicaid).”¹⁷

¹⁶ October 2025 Order at 24.

¹⁷ October 2025 Order at 11-12.

The LIHEAP State Plan plainly states that income documentation must be provided by LIHEAP applicants demonstrating that the applicant is eligible for assistance based on income received in “the 12 months or the calendar month prior to the month of application.”¹⁸ Rather than submit income documentation directly to DHS, a LIHEAP applicant may authorize DHS to utilize documentation already on file to verify household income for Supplemental Nutrition Assistance Program (SNAP) or Medicaid recipients, thereby alleviating the requirement for the LIHEAP applicant to submit duplicative income documentation.¹⁹ Contrary to the Commission’s assertions, the *only* instances where the use of income on file would result in reliance on income information provided more than 12 months from the data of application are in cases where (1) the LIHEAP applicant is also a SNAP recipient and (2) the household consists entirely of individuals who are elderly or permanently disabled.²⁰ Income information for Medicaid is verified every year. Therefore, reliance on income documentation on file with DHS for Medicaid to approve a LIHEAP grant would never result in reliance on documentation that is more than 12 months old.²¹

Further, DHS has established processes to ensure that income is accurate even if the household is not required to submit annual documentation. This includes the use of an electronic exchange process with the Social Security Administration to verify income changes (including the annual Cost of Living Adjustment),²² as well as the use of a “Semi-Annual Reporting” (SAR) process to monitor for any change in earned income that would trigger additional verification requirements.²³ There are also strict penalties for households that fail to affirmatively report a change in household income.²⁴

¹⁸ Pa. DHS LIHEAP State Plan, § 601.83 (Treatment of income).

¹⁹ Pa. DHS LIHEAP State Plan, § 601.102(2) (Income).

²⁰ DHS SNAP Handbook §§ 575.21, -.22; 7 CFR § 273.10(f)(1).

²¹ 42 CFR § 435.916(a).

²² DHS SNAP Handbook § 572.4; 7 CFR § 273.12(e)(3).

²³ DHS SNAP Handbook § 571.2.

²⁴ 7 CFR § 273.12(d).

When a households' sole members are low income seniors and/or individuals with a permanent disability, and that household is deemed eligible for participation in both SNAP and LIHEAP (*the only households where it is possible that income information can be older than 12 months*) CAUSE-PA submits that it is abundantly reasonable for the Commission to allow the income verification performed by DHS to substitute for the income verification needed to enroll the household in CAP.

15. Admitted.

By way of further Answer, CAUSE-PA has been actively collaborating with Peoples and other stakeholders to help refine and finalize communications targeted to low income shopping customers that are otherwise eligible for auto-enrollment in CAP following receipt of a LIHEAP grant. Competitive market data has continually shown that low income shopping customers pay substantially more than the default service price and have a correspondingly higher risk of involuntary termination.²⁵ Unfortunately, while low income shopping customers facing higher charges are often most in need of rate assistance and debt forgiveness through CAP, there are regulatory barriers that currently complicate streamlined enrollment. As such, it is critical to develop robust outreach to low income shopping customers to help improve timely enrollment in CAP – prior to the accrual of unnecessarily high debts that ultimately serve to increase the cost of the program for other customers. CAUSE-PA intends to continue to work with the Company to improve outreach to low income shopping customers and to ensure that these households are able to enroll in CAP in a timely manner. In turn, we implore the Commission to advance regulatory

²⁵ See *Pa. PUC v. UGI Utilities, Gas Division*, CAUSE-PA St. 1, Exhibits 1 & 2, Docket R-2024-2052716 (served April 18, 2025); *Pa. PUC v. Columbia Gas of Pa.*, CAUSE-PA St. 1, Exhibits 1 & 2 (June 18, 2025); see also *Petition of PPL Electric Utilities for Approval of Default Service Program for the Period of June 1, 2025 through May 31, 2029*, CAUSE-PA Statement 1, Exhibits 1 & 2, Docket No. P-2024-3047290 (June 3, 2024).

changes to shorten the timeframe for gas switching and to improve access to CAP for low income customers facing unmanageable debts as a result of excessive charges in the competitive market.

16. Admitted.

17. Admitted.

18. Admitted.

By way of further Answer, CAUSE-PA notes that there are multiple additional concerns regarding the use of hardship funds prior to or instead of CAP enrollment to assist low income customers in managing past due balances. First, the plain terms of Peoples' Hardship Fund, approved by the Commission, require households to "first apply for all other available energy assistance resources" before they are considered eligible for a Hardship Fund grant, which is appropriate for a fund of last resort.²⁶ Second, Peoples' hardship funding is limited. In its most recent program year, Peoples ran out of hardship funds by July 2025, leaving no funds for those otherwise ineligible for CAP to obtain assistance to maintain or restore service. Finally, in October and November, hardship fund grants are only available to those customers at risk of losing service, or those who are currently without service. From December to February, hardship fund grants are only available to those without service.²⁷ Given the overlapping timing of the LIHEAP season and the winter moratorium, any customer who has active service would not be eligible for a hardship fund grant for most of the LIHEAP season.

Diverting limited and restricted hardship funds to serve as a frontline solution to cure the arrearages of low income households in this manner would not be practical nor effective, and would diverge substantially from existing universal service policies that seek to utilize limited hardship fund dollars to address acute hardship not able to be resolved through CAP.

²⁶ CAUSE-PA Petition for Reconsideration at ¶ 38 (Filed May 9, 2025); citing Peoples 2019 USECP at 30-31.

²⁷ Id. at 30.

19. Admitted.

20. Admitted.

By way of further Answer, to help assist with evaluation of Peoples' auto-enrollment program, CAUSE-PA recommends that Peoples track the reason for opt-out and whether customers opted out before or after the opt-out grace period (90 days) as proposed in its Amended Petition.

21. Admitted.

22. Admitted.

By way of further Answer, to help improve successful implementation of Peoples' auto-enrollment program, CAUSE-PA recommends that Peoples flag any accounts who have opted out from CAP so that they are not auto-enrolled in future LIHEAP season.

23. Admitted.

24. Admitted.

IV. CONCLUSION

WHEREFORE, CAUSE-PA urges the Commission to swiftly approve Peoples' Amended Petition to initiate CAP auto-enrollment for its customers who meet the criteria outlined above, and who consent to sharing their data with Peoples for that express purpose.

Respectfully submitted,

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