



March 3, 2026

VIA ELECTRONIC FILING

Matt Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – 2nd Floor
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

Dear Secretary Homsher:

Enclosed for filing, please find Peoples Natural Gas Company LLC’s (“Peoples” or “the Company”) Petition to Amend its Universal Service and Energy Conservation Plan (“USECP”). With this Petition, Peoples seeks Pennsylvania Public Utility Commission (“Commission”) approval to utilize a portion of its 2025 Low Income Usage Reduction Program (“LIURP”) carryover to stabilize funding to its Emergency Furnace/Service Line Repair Assistance Program (“EFSLR”) as funding is expected to run out on or before April 1, 2026. *Peoples respectfully requests expedited treatment of this Petition by April 1, 2026 so that the Company can maintain funding for its EFSLR Program for the remainder of the annual program period.*

In addition to the stabilization of this year’s funding, Peoples seeks approval to increase its EFSLR budget in future years to \$2,000,000 to ensure the program remains an available safety net for its vulnerable households. Peoples proposes to replace pages 23 and 24 of its currently effective USECP with the version provided as an attachment to this letter in order to reflect an increased budget for its LIURP – EFSLR Program for each remaining program year of the effective period of its USECP. It also includes language that will allow Peoples to carryover any unused funds from one program year to the next. The increase to EFSLR budget is necessary for the following reasons:

- Peoples EFSLR annual budget renews October 1 of each year. Since October 1, 2025, Peoples has spent, as of the date of this Petition, \$1,151,800, leaving only \$348,200 remaining until the end of the budget year on September 30.
- The Low Income Home Energy Assistance Program (“LIHEAP”) was delayed in opening in 2025. This delay required customers who would otherwise be eligible for assistance from LIHEAP’s Emergency Services Program to receive assistance from Peoples EFSLR. Peoples estimates it spent \$590,108 in support of these LIHEAP eligible households
- The transfer of \$500,000 of LIURP carryover from 2025 to EFSLR will not result in any changes to the Universal Service Rider.
- Lastly, the addition of \$500,000 to the Company’s annual EFSLR Program in future years will result in an approximate one-cent increase per Mcf for customers subject to the reconcilable Universal Services Rider.

Peoples is not seeking to change any other aspects of the EFSLR Program through this request. The Company provides regular updates on utilization of the EFSLR at its quarterly Universal Service Advisory Group. Prior to seeking this request, Peoples raised its funding concerns with representatives of the Office of Consumer Advocate (“OCA”) and the Coalition for Affordability Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”). Both parties support the Company’s proposal to stabilize current funding through the use of LIURP carryover and to increase the annual budget amount to \$2,000,000 per program year in future years in order to secure this important safety net for eligible homeowners and renters in need of emergency services for their heating systems or gas lines.

Lastly, Peoples is requesting expedited treatment of this Petition in order to maintain funding for its EFSLR Program.

Please contact Rita Black (412-208-6530) or the undersigned should you have any questions or require further information regarding this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JP', with a stylized flourish extending to the right.

Jennifer L. Petrisek
Sr. Counsel

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

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Jennifer L. Petrisek
Sr. Counsel

Dated this 3rd day of March, 2026.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Peoples Natural Gas Company LLC :
to Amend its Current Universal Service and : Docket Nos. M-2018-3003177
Energy Conservation Plan, 2019-2024 : M-2020-3021343
:

**PETITION OF PEOPLES NATURAL GAS COMPANY LLC TO AMEND ITS CURRENT
UNIVERSAL SERVICE AND ENERGY CONSERVATION PLAN 2019-2024.**

Peoples Natural Gas Company LLC (“Peoples” or “the Company”) hereby files this Petition seeking to amend its current Universal Service and Conservation Plan¹ (“USECP”). This Petition requests authorization to allow the Company to transfer \$500,000 of its carryover Low Income Usage Reduction Program (“LIURP”) funding to its LIURP Emergency Furnace/Service Line Repair (“EFSLR”) program to ensure sufficient funding for EFSLR through September 30, 2026, the end of the current program year. Further, to ensure sufficient funding for EFSLR going forward, the Company wishes to increase the annual budget from \$1,500,000 to \$2,000,000 beginning with the next budget year which will commence October 1, 2026 and to add language to its USECP that allows the Company to carryover any unspent funds from one program year to another, consistent with the operation of LIURP.

In support of the instant Amended Petition, Peoples states as follows:

I. Introduction

1. Peoples is a “public utility” and a “natural gas distribution company” as those terms are defined in Sections 102 and 2202 of the Code, 66 Pa. C.S. §§ 102, 2202. Peoples provides natural gas services to more than 700,000 customers in all or portions of the following Pennsylvania counties: Allegheny, Armstrong, Beaver, Blair, Butler, Cambria, Clarion, Clearfield, Fayette, Greene, Indiana, Jefferson, Lawrence, Mercer, Somerset, Venango, Washington and Westmoreland.

¹ On November 26, 2024, Peoples filed updates to its current USECP to reflect changes approved by Commission Order in the Company’s most recent base rate case, Docket No. R-2023-3044549. The USECP included with this Petition already incorporates the changes from that referenced rate case docket. The updates to Peoples’ USECP filed on November 26, 2024 were approved by Secretarial Letter dated December 13, 2024.

2. Peoples is a large jurisdictional natural gas distribution company obligated to submit an updated USECP every three years to the Commission for approval. 52 Pa. Code § 62.4.

3. Peoples' current USECP plan for 2019-2024 was approved by the Commission on May 12, 2022 and was amended on November 9, 2023 and November 26, 2024².

4. The names, addresses and telephone number of the Company's counsel for the purposes of this filing are as follows:

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Peoples' counsel is authorized to receive all notices and communications regarding this filing.

II. Peoples Prior Petition to Amend its EFSLR Budget Within the Current USECP

5. On February 27, 2025, Peoples filed a Petition³ to Amend its 2019 USECP. Specifically, the Petition requested Commission approval to increase its annual EFSLR budget to \$1,500,000 from \$1,000,000. The Petition was approved March 27, 2025.

III. Peoples Current Petition to Amend its Current USECP

A. Background.

6. The Low Income Home Energy Assistance Program ("LIHEAP") was delayed in opening until December 10, 2025.

² The most recent amendments to Peoples 2019 USECP were approved by Commission Secretarial Letter issued on December 13, 2024, at Docket Nos. M-2018-3003177, M-2020-3021343, and R-2023-3044549. All references to Peoples' 2019 USECP refer to the most recently approved version.

³ P-2025-3053645

7. Customers with incomes at or below 150% of the federal poverty level and experience a heating system emergency in the fall season are typically referred to the LIHEAP Emergency Services Program for assistance. These referrals allow the Company to maintain sufficient funding for customers whose income is within 151 and 200% of the federal poverty level or who have immediate needs best served through the Company's EFSLR.

8. Due to the delay in LIHEAP, the Company served all customers needing emergency assistance in the fall of 2025, prior to the opening of LIHEAP on December 10, 2025.

9. The Company has identified it spent \$590,108 servicing customers who would otherwise have been served through the LIHEAP Emergency Service Program if that program had opened as originally scheduled.

10. The EFLSR opened the current budget year October 1, 2025 and through mid-January 2026, \$1,151,800 was spent, leaving \$348,200 remaining for the budget year which ends September 30, 2026.

11. On January 28, 2026, the Company shared information with its Universal Service Advisory Group ("USAG") regarding the status of funding for EFSLR, including a description of the budget dollars that were spent to support customers who could not be serviced through LIHEAP due to its delayed opening. The Company described its interest in filing a petition to stabilize funding for EFSLR and sought the input of USAG members regarding its proposal.

12. This Petition incorporates input provided by members of the USAG.

13. The attached exhibit is a replacement of pages 23 and 24 of the current USECP, specifically making the following changes:

a. Modifying the 2026 budget to reflect \$2,000,000, of which \$500,000 is proposed to come from its LIURP carryover from 2025.

b. Modifying the 2027 budget to reflect \$2,000,000 as the proposed level of annual funding going forward.

c. Denotes that any unspent funding in the current budget year will be carried over to the

next budget year.

IV. Service

14. Pursuant to the Commission's regulations at 52 Pa. Code § 121.4(a), Peoples is serving this Petition to Amend its Current USECP on the statutory advocates and all of the parties of record in the Company's currently effective USECP, Docket Nos. M-2018-3003177 and M-2020-3021343.

V. Conclusion

15. Based upon the foregoing, Peoples Natural Gas Company LLC respectfully requests that the Commission grant this Amended Petition.

Respectfully submitted,



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Dated: March 3, 2026

EXHIBIT A

- Must have a need for emergency repairs and/or replacement of the heating system, hot water heater and/or gas lines. Non-emergency repairs and replacements are not covered by this program.
- Residential, gas-heating customers only
- Customers should apply for LIHEAP/Crisis if the program is available.
- All requests for assistance will be processed on a first-come, first-served basis.

The Company may refer eligible customers to LIHEAP Crisis when that program is available. This referral process allows Peoples to protect available funds of the program for use by those with immediate needs that cannot await LIHEAP Crisis as well as those customers who do not meet LIHEAP Crisis income qualifications (i.e. 151 to 200% FPL).

All potential repairs or replacements are evaluated by a contractor on behalf of the company to determine if the project is suitable to be covered by the program.

Needs Assessment

Based on historical participation Peoples estimates 355 customers to receive assistance through this program on an annual basis.

Projected Enrollment Levels

Because the prices for labor and materials consistently increase, and with the addition of limited restoration costs on an as necessary basis, the number of customers assisted will vary in relation to the types and costs of projects completed in a given year.

Program Budget

	Peoples Natural Gas
2019	\$860,000
2020	\$960,800
2021	\$987,374
2022	\$1,014,746
2023	\$1,042,938
2024	\$1,068,975
2025	\$1,500,000
2026	\$2,000,000
2027	\$2,000,000
2028	\$2,000,000
Total	\$11,934,833

The budget was developed using average costs for project types: boiler replacement, furnace replacement, heating system repairs and gas service line replacements. Additionally, the

Company assumed 20% of the service line projects will require repair/replacement of sidewalks. The costs above include third party administration, but do not include internal labor.

The approved settlement of the acquisition of the Peoples companies included an increase to this program of \$75,000 annually. This increase is funded by shareholders for a three-year period post-closing. After the three-year period, the program will be funded by the approved cost recovery mechanism in place at that time. The increase of \$75,000 is an increase of 8.8% to existing budgets (\$850,000).

Any unspent funds in a program year will be carried over the next program year.

Organizational Structure

See Organizational Chart on page 4.

Outreach and Intake Efforts

Peoples will coordinate the emergency program with existing programs through Department of Community Economic Development (“DCED”) and LIHEAP Crisis and will accept referrals from community-based organizations, Company representatives and other third parties.

Identification of Low-Income Customers

As this is an emergency assistance program, customers self-identify or are referred by local community service agencies or Company field personnel.

Program Integration

The program is currently administered by CLEAResult. In order to realize efficiencies and better coordinate with other programs, the agency will utilize subcontractors who are currently working to implement the Peoples’ LIURP program.