



March 13, 2026

**VIA E-File**

Mr. Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
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, P-2026-3060819**

**CAUSE-PA Letter In Lieu of Answer**

Dear Secretary Homsher:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) submits this Letter In Lieu of Answer in response to the Petition of Peoples Natural Gas Company, LLC (Peoples) filed March 3, 2026, at the above referenced dockets.<sup>1</sup> In its Petition, Peoples is requesting expedited approval to reallocate a portion of its carryover LIURP budget to bolster its Emergency Furnace/Service Line Repair Assistance Program (EFSLR) budget for the current program year and increase its annual EFSLR budget going forward to meet the demonstrated need in its service territory.

Specifically, Peoples seeks approval to:

- (1) Move \$500,000 of carryover LIURP funding to its Emergency Furnace/Service Line Repair Assistance Program (EFSLR) for the current program year; and
- (2) Increase the annual budget for its EFSLR by \$500,000 for each year through 2028; and

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<sup>1</sup> Peoples Natural Gas Company LLC's Petition to Amend its Universal Service and Energy Conservation Plan for 2024–2028, Docket Nos. M-2018-3003177, M-2020-3021343, P-2026-3060819, (filed Mar. 3, 2026), <https://www.puc.pa.gov/pcdocs/1916384.pdf>, (hereinafter, Petition).

- (3) Permit automatic rollover of any unspent EFSLR funds to the next program year; and
- (4) Have this Petition approved in an expedited timeframe, by April 1, 2026.

Peoples has requested expedited approval of this Plan Amendment to avoid a funding shortfall for the current program year and ensure that their EFSLR has sufficient funding to assist their low income customers through the next several years.

**CAUSE-PA supports Peoples’ Petition and urges swift approval of the relief contained therein.** We note that in advance of filing its Petition, Peoples proactively consulted with the CAUSE-PA, Office of the Consumer Advocate (OCA), and its Universal Service Advisory Group to gather stakeholder input before filing – an approach which we commend.

Peoples’ proposal is in response to a significant shortage of emergency heating repair funds and significant demand in its service territory. The delayed opening of LIHEAP Emergency Services, which performs emergency furnace repairs during the LIHEAP season, required Peoples to assume responsibility for repairs that LIHEAP would typically fund, resulting in an estimated \$590,108 in additional EFSLR expenditures and a far more rapid depletion of the program’s budget than anticipated.<sup>2</sup> The 2025-2026 winter season brought significant snowfall and prolonged periods of extreme cold temperatures—conditions that the PUC recognized could strain natural gas systems and increase energy demand—which, in turn, drove up heating costs for consumers and heightened the need for emergency repairs.<sup>3</sup>

The timely repair of primary heating sources for low income households—including nonfunctional gas furnace or gas lines—is essential not only to maintain safe temperatures in the home, but also to avoid unsafe and costly alternative heating methods. In the absence of prompt repairs, households are often forced to choose between enduring dangerously freezing conditions or resorting to de facto heating sources such as electric spaces heaters, ovens, kerosene heaters, and other high-usage, ad hoc alternatives to keep their homes habitable. Not only are these alternative methods of heating very costly for ratepayers, but they are also incredibly dangerous. According to the National Fire Protection Association, of all home fires caused by heating equipment, space heaters and heating stoves were the type of heating equipment responsible for more than one-quarter (29%) of home heating equipment fires, nearly eight out of ten deaths (77%), seven out of ten (71%) of the injuries, and the largest share of dollar loss (48%).<sup>4</sup>

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<sup>2</sup> Petition at ¶ 9.

<sup>3</sup> Pennsylvania Public Utility Commission, *PUC Urges Consumers to Prepare Ahead of Winter Storm Fern and Prolonged Extreme Cold* (Press Release, Jan. 23, 2026), <https://www.puc.pa.gov/press-release/2026/puc-urges-consumers-to-prepare-ahead-of-winter-storm-fern-and-prolonged-extreme-cold-01232026>

<sup>4</sup> National Fire Protection Association, *Heating Safety*, <https://www.nfpa.org/education-and-research/home-fire-safety/heating> (last visited Mar. 11, 2026) (noting that space heaters account for a disproportionate share of home heating fires).

While a household that is in CAP may not immediately experience higher monthly bills as a result of increased electrical usage, those additional costs increase the costs of CAP, which inevitably results in higher rates for all ratepayers. In this context, the use of rollover LIURP funds to stabilize the EFSLR budget is both appropriate and necessary, ensuring that critical emergency repairs can continue uninterrupted. Moreover, because federal LIHEAP funding is subject to annual congressional appropriations, Peoples' decision to proactively ensure its EFSLR budget is sufficiently funded is a commendable step to safeguard vulnerable households from future funding gaps.

Ensuring adequate EFSLR funding, both for this program year and going forward, is critical to ensure that low income households can avoid relying on unsafe and expensive alternative heating sources. We commend Peoples Gas for having the forethought to request an increase in their EFSLR budget so that they can continue to provide potentially life-saving furnace and gas line repairs for low income households.

For these reasons, CAUSE-PA urges the Commission to approve Peoples' Petition, which is squarely in the public interest and to the benefit of low income consumers in and around the Pittsburgh region. In turn, we recommend the Commission encourage gas and electric utilities to similarly evaluate and address the anticipated increased funding needs for emergency heating repair programs across the Commonwealth.

Respectfully Submitted,



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

CC: *Certificate of Service*  
*Secretary Chiavetta (Cover Letter and Certificate of Service only)*  
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**Verification**

I, Elizabeth R. Marx, Esq., legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing Letter in Lieu of Answer are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



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On behalf of the Coalition for Affordable Utility  
Services and Energy Efficiency in Pennsylvania  
(CAUSE-PA)

Date: March 13, 2026

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Peoples Natural Gas Company, LLC	:	
Petition to Amend its Universal Service and	:	Docket Nos. M-2018-3003177
Energy Conservation Plan	:	M-2020-3021343
	:	P-2026-3060819
	:	

**Certificate of Service**

I hereby certify that I have on this day served copies of the **Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania Letter In Lieu of Answer to the Petition of Peoples Natural Gas Company LLC** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA Email**

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Respectfully Submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
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March 13, 2026

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