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VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Columbia Gas of Pennsylvania, Inc.
Universal Service and Energy Conservation Plan for 2024-2028
Docket No. M-2023-3039487**

Dear Secretary Homsher:

Enclosed for filing on behalf of Columbia Gas of Pennsylvania, Inc. (“Columbia”) are the Health & Safety Pilot and Emergency Repair Program Reports. This filing is made pursuant to the Public Utility Commission’s Order dated April 4, 2024, in the above docket, at Ordering Paragraph Nos. 11 and 13, as amended by Order dated July 1, 2024, at Ordering Paragraph No. 5. Also enclosed is Columbia’s LIURP Needs Assessment.

Should you have any questions, please contact Deb Davis at ddavis@nisource.com.

Very truly yours,

Candis A. Tunilo

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Columbia Gas Health & Safety Pilot Report

Key Objectives

- To decrease the number of deferred jobs due to conditions in the home, such as knob and tube wiring, moisture in basement due to leaky roofs, and other minor structural issues.
- To reduce usage in CAP customers' homes that could not be weatherized without remediating identified Health and Safety issues.

Eligibility

- Must be an active CAP customer with shortfall greater than \$1,000 per year on average.
- Customer must own and reside in dwelling for a minimum of six months.
- Prior annual usage must be greater than 1600 therms or 250 average therms per winter months.
- A present Health and Safety issue that is preventing weatherization including, but not limited to, knob and tube wiring, presence of moisture, mold or mildew.
- The elimination of the Health and Safety issue will result in comprehensive measure installation and expected usage reductions greater than 18%.

Annual Funding

- Up to \$600,000 can be spent for Health & Safety measures

Attached as Appendix A is a full evaluation completed by Green Energy Economics Group.

2024

Total Health & Safety ("H&S") Spend: **\$179,152.63**

Total Cost of all homes weatherized through H&S \$1,298,347.32

of Homes Completed: **65**

Average Spend **\$2,756.19**

The average total cost of a completed job including H&S is \$19,974.57

Demographics

Customers resided in 7 counties including Adams, Allegheny, Fayette, Beaver, Lawrence, Washington, and York.

2025

Total Spend: **\$125,486.79**

of Homes Completed: **52**

Average Spend **\$2,413.21**

Columbia Gas of Pennsylvania 2026 LIURP Health and Safety Pilot Program Evaluation

Program Activity from January 2022 through September 2024



March 2026

Acknowledgements

The work described in this study was supported by Green Energy Economics Group, Inc. (GEEG)

All opinions, errors and omissions remain the responsibility of the authors. All reference URLs were accurate as of the date of publication.

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1 PILOT PROGRAM OVERVIEW

1.1 Pilot Program Design

The Health and Safety (H&S) Program is a component within the Columbia Gas Low Income Usage Reduction (LIURP). The H&S Program is designed to decrease the number of deferred jobs due to conditions in the home such as knob and tube wiring, moisture in the basement due to leaky roofs, and other minor structural issues. In addition, the program is designed to reduce usage in Customer Assistance Program (CAP) customers' homes that could not be weatherized without first remediating identified health and safety issues.

1.2 Eligibility Criteria

The following criteria must be met for a LIURP customer to be eligible for the H&S Program:

- Must be an active CAP Customer with a shortfall greater than \$1,000 per year on average.
- Customer must own and reside in a dwelling for a minimum of six months.
- Pre-installation usage must be greater than 1600 therms or 250 average therms per winter month.
- A present health and safety issue that is preventing weatherization including, but not limited to, knob and tube wiring, presence of moisture, mold or mildew.
- The elimination of the identified health and safety issue will result in comprehensive measure installation and expected usage reductions greater than 18%.

1.3 Pilot Program Delivery

Potential H&S Program customers are enrolled through traditional LIURP channels. If, at the time of an energy audit, the LIURP contractor identifies necessary Health and Safety repairs that exceed the \$1,200 per home allowance preventing the installation of comprehensive measures, the contractor may request additional health and safety allowance under the H&S Program. Additional health and safety spending allowance is authorized based on a model that considers (4) pre-treatment scenarios. Those scenarios consider 16 to 20 additional variables to arrive at an additional health and safety allowance.

Once authorization is granted from Columbia Gas, the contractor utilizes the additional health and safety allowance along with the initial \$1,200 allowance to conduct the necessary actions to remediate the home's issue. Following successful remediation, the contractor is authorized to install the comprehensive measure mix allowed under the traditional LIURP.

1.4 Measures

Allowable program measures include any remediation efforts deemed necessary within the allowable additional spending authorization to remove the barrier for the installation of comprehensive LIURP measures. Common barriers to be remediated are expected to include, knob and tube wiring, roof leaks, and moisture issues.

2 PILOT PROGRAM EVALUATION

2.1 Methodology

2.1.1 Goals

The goals of the evaluation are:

- 1) Summarize results and trends of the of H&S program related to savings, costs, customer feedback, and inspections.
- 2) Evaluate outcomes from the H&S Program within the context of Columbia's overall LIURP.

2.1.2 Approach

- **Document Review:** GEEG reviewed program and project level documents for the H&S Pilot Program and LIURP as part of the evaluation. This data was used for informational purposes as well as to analyze trends for improvement. The document review as part of this evaluation included:
 - Post inspection reports
 - Customer satisfaction surveys
 - Project invoices (sample)
 - Program Annual Reports
 - Prior evaluations
 - Columbia Gas USECP filing
 - Various program presentations
- **Analysis of H&S Pilot Program Data:** GEEG analyzed H&S program and project level data related to savings, costs, budgets, cost-effectiveness, and barrier mitigation measure-mix. This analysis was used to provide a summary of key findings for program improvement and to highlight program successes.
- **Comparative Analysis with LIURP Data:** GEEG compared the results of our multiple analyses for the H&S Pilot Program to those for non-H&S LIURP participants on metrics including demographics, savings results, cost-effectiveness, contractor performance, and customer satisfaction. This analysis was used to highlight any differences in outcome for customers that were provided services in the H&S Pilot Program versus the traditional LIURP.

2.2 Results – Document Review

This section reviews the results of GEEG’s analysis as part of the document review of customer satisfaction surveys and post inspection reports.

2.2.1 Customer Satisfaction

To gauge customer satisfaction, Columbia Gas includes a customer satisfaction survey in every LIURP customer’s informational packet with prepaid return envelope. The customer is encouraged to fill out the survey after project completion and mail it back to Columbia Gas. As part of the evaluation, GEEG was provided every returned customer satisfaction survey for both H&S Pilot Program participants and participants in the traditional LIURP during the evaluation period. Table 1 below shows the survey response rates during the evaluation period.

Table 1. Customer Satisfaction Survey Response Rate 2022 - September 2024

Program	Surveys Provided	Surveys Received	Response Rate
H&S Pilot Program	115	1	0.8%
Traditional LIURP	1,029	22	2.1%
Total	1,144	23	2.0%

It was the initial intention of the evaluation to conduct an analysis of customer satisfaction survey feedback for the H&S Pilot Program and include the results of both programs in the comparative Analysis. However, the overall low response rate of surveys returned does not yield a statistically significant example for either program. Even with the small sample size, anecdotal evidence showed a positive experience for customers overall. When asked for their impressions of the auditor, customers generally found them knowledgeable and professional. For the work crew, customers generally found them professional, hardworking, and polite. When asked to rate their overall satisfaction rating with Columbia Gas and the services provided, 91% of the respondents gave a perfect 10/10 score, with the average score being 9.7/10. A sample of additional comments customers shared are listed below.

“Friendly respectable team” – J. King

“Again, 100% an A+ on a job very well done.” – R. McCleery Jr.

“Tyler and Sean were well informed and polite.” – I. Gattian

Given the low response rate, updates to the process of gathering customer satisfaction results should be so that a statistically significant number of responses can be included in future evaluations. **First, Columbia should consider including a customer satisfaction questionnaire collected verbally during the post inspection. The results should be included in the post inspection report and uploaded into the Vision data collection system.** This would automatically ensure a response rate of over 20% of all jobs based on

post inspection rates and customer availability. **Second, Columbia should consider providing customers with a follow up email to customers containing a link to a survey.** Most customers provide an email address as part of their application, and it is more common for customers to respond to requests via email as opposed to traditional mail. The results of these survey links would also be easier to aggregate and analyze for the program management team and would likely be received in a timelier manner than mailed surveys.

2.2.2 Post Inspection Reports

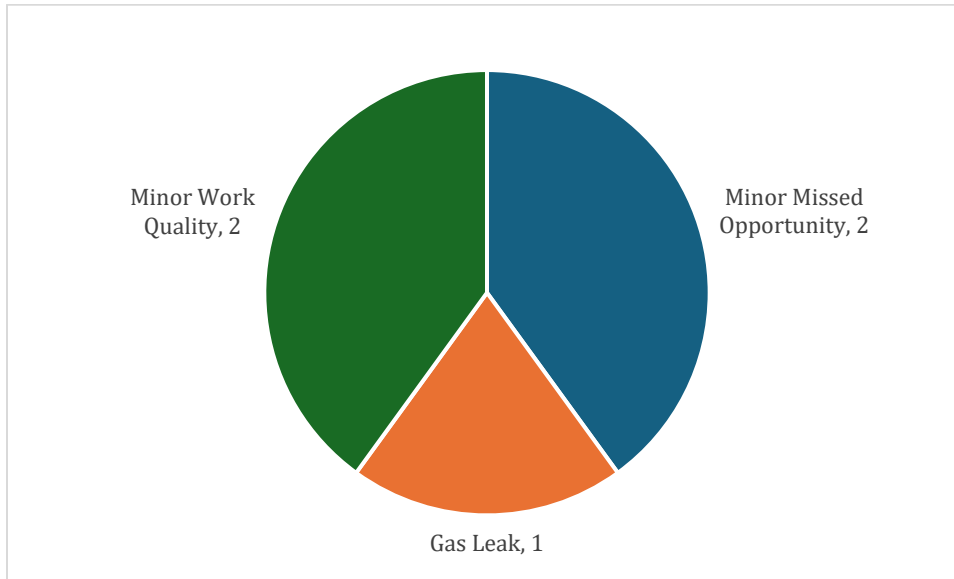
To identify issues relating to job quality, missed opportunities, and overall contractor performance, Columbia Gas conducts post-installation inspections on at least 20% of completed projects. The inspector collects information about the project, runs blower door testing to compare results with the contractor, assesses the quality of the measures installed, and verifies that the measures installed were done so in the appropriate priority and that no high priority measures that could have been installed were not. As part of this evaluation, GEEG was provided scans of each post inspection report that was conducted during the evaluation period. The review of these scans focused on identifying overall trends in inspection outcomes and the potential for recommendations to improve future post inspections.

During the evaluation period a total of 17 post inspections were conducted on H&S Pilot Program participating jobs. The majority (76%) received an inspection outcome of either “Passed” or “Passed with Comment”. This shows that the participating contractors were performing work to the standards of the program. The remaining 24% of completed post inspections received an outcome of “Failed Non-Emergency”. This indicates that program standards were not met, but the reasoning for this was not an emergency that the contract needed to return immediately but did need to return to address the issues found. None of the 17 post inspections received an outcome of “Failed H&S”, which indicates that the job had an outstanding health and safety issue after the work was completed that needs to be addressed immediately. The tables and figures below highlight various data points of the 17 post inspections conducted by Columbia Gas during the evaluation period.

Table 2. Inspection Outcomes by Count and Percentage of Total

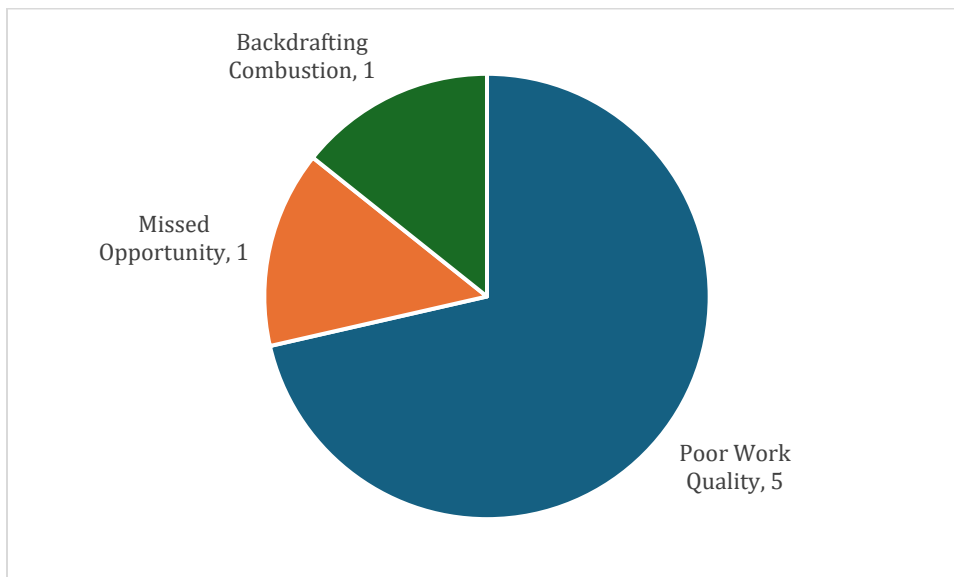
Inspection Outcome	Outcome Count	Outcome Percentage
Pass	9	53%
Pass with Comment	4	23.5%
Failed non-emergency	4	23.5%
Failed H&S	0	0%
Total	17	100%

Figure 1. Pass with Comment Outcome Categories



*One inspection had two comments, resulting in five total comments with four post inspections.

Figure 2. Failed Non-Emergency Outcome Categories



*One inspection had multiple reasons for failure, resulting in seven total categories with four post inspections.

Our review of post-inspection reports included all LIURP and H&S Pilot Program participants receiving a post-inspection during the evaluation period. This provided a more meaningful sample size with a total of 282 post inspection reports. During this review we made several observations on the trends found in the inspection reports that could be improved upon. First, the average time between an audit being conducted and the post inspection was 94 working days. Considering that during this time both weatherization and

heating, ventilation, and air-conditioning (HVAC) contractors were scoping and conducting work, in addition to the work being assigned to and scheduled by the post inspector, this is a satisfactory amount of time that shows a prioritization on timely post inspections and work completion. Next, as referenced in section 2.2.1, there is **no requirement for customer feedback on the post inspection form**. The inspector did include customer feedback on several inspection forms, but this was not the normal process and is missing an opportunity to collect valuable insight at the time of inspection. We also found that there are **inconsistencies in how inspectors treat the inspection outcome of gas leaks that are found at inspection and repaired on the same day as the inspection**. The inspectors uniformly identify and report gas leaks immediately and ensure that the leaks are fixed prior to leaving the home as part of the Columbia Gas required gas leak protocol. However, some inspections resulted in a failed outcome, while others resulted in a pass with comments outcome. While some outcomes most certainly require the inspector to exercise their best judgement, and it is unavoidable to have slight variance in outcomes across multiple inspectors, **where issues such as gas leaks are concerned, there should be a programmatic rule for consistency**. Last, the post-inspection reports being collected on handwritten forms and uploaded into the system of record makes data analysis on outcomes and contractor trends a manual process that is time consuming and with a high potential for error. Columbia Gas should **consider alternative methods of collecting inspection results** that could more easily track contractor trends to provide the feedback more consistently to contractors.

2.3 Results – Pilot Program Data

This section reviews the results of the analysis of the provided H&S Pilot Program data. The focus of this analysis was on the budget allocation for and spending on each project toward the mitigation of health and safety barriers, as well as the mix of measures included in the barrier mitigation.

2.3.1 Budget Allocation and Spending

Throughout the evaluation period the full allocation allowance was not necessary to mitigate the H&S barrier(s) to weatherization work in 98% of the projects and 90% of the total projects required over \$1,000 less than the full allocation allowance. Tables 3 and 4 show allocation spending details at the pilot program and project level.

Table 3. H&S Allocation Allowance and Spending (January 2022 – September 2024)

Total Projects	Total Allocation	Total Spending	Average Allocation/Project	Average Spending/Project	% of Allocation Spent
115	\$1,183,046.26	\$430,533.69	\$10,287.36	\$3,743.77	36.4%

Table 4. Project Level Allocation Allowance Underspending

Total Projects	Unspent Allocation Projects	Unspent Allocation >\$1,000 Projects
115	113 (98%)	104 (90%)

This data show that while there is a need for the ability to spend more than the traditional LIURP, a health and safety allowance of \$1,200 per project will mitigate barriers to weatherize for a substantive number of customers. Likewise, the current formula used for allocations is providing excessively high allocations compared to the need for remediation. The current allowance calculation formula is unnecessarily complex given the amount of spending. There is sufficient data provided to improve the allocation formula given the number of successfully complete projects in this evaluation period, and those that have been completed after this evaluation period.

Columbia Gas should consider simplifying the allowance formula and process to enable contractors to easily understand their potential H&S allowance on any given project. Furthermore, a “request for additional spending” process could be implemented that enables contractors to request a larger allowance for projects where the simplified formula falls short of the need for barrier mitigation. As part of this evaluation, the allowance provided versus allowance spent data was used to run multiple scenarios on simplifying the allowance formula. From those scenarios we arrived at four simplified scenarios that are shown in Table 5. Each of these simplified scenarios would have yielded a sufficient allowance for at least 80% of the projects, with 20% or fewer projects needing to utilize a “request for additional spending” process. The simplified scenarios included in Table 5 are explained below.

\$3.75/Square Foot Calculation – This calculation applies an allowance of \$3.75 per square foot of the home size.

\$4/MCF Calculation – This calculation applies an allowance of \$4 per MCF of natural gas used by the customer in their last 12 months of usage provided.

\$4.50/Square Foot Calculation – This calculation applies an allowance of \$4.00 per square foot of the home size.

\$7,500/Home – This scenario is absent of a calculation and simply provides an allowance of \$7,500 per home participating in the H&S Pilot.

Table 5. Simplified Allowance Calculation Examples

Simplified Calculation	Total H&S Allowance	Average H&S Allowance/Project	Insufficient Project Allowances
\$3.75/Square Foot	\$774,262	\$6,733	23 (20%)
\$4/MCF	\$759,564	\$6,605	23 (20%)
\$4.50/Square Foot	\$929,115	\$8,079	18 (16%)
\$7,500/Home	\$862,500	\$7,500	13 (11%)

It is our recommendation to **provide an allowance of \$7,500 per home**. While this is still providing an allowance greater than the average amount spent on remediation, it would meet the remediation needs of most customers in the H&S Pilot, reducing a great need for contractors to utilize a “request for additional spending” process. This simplification would also reduce administrative burden in calculating the allowance and negotiating with remediation contractors.

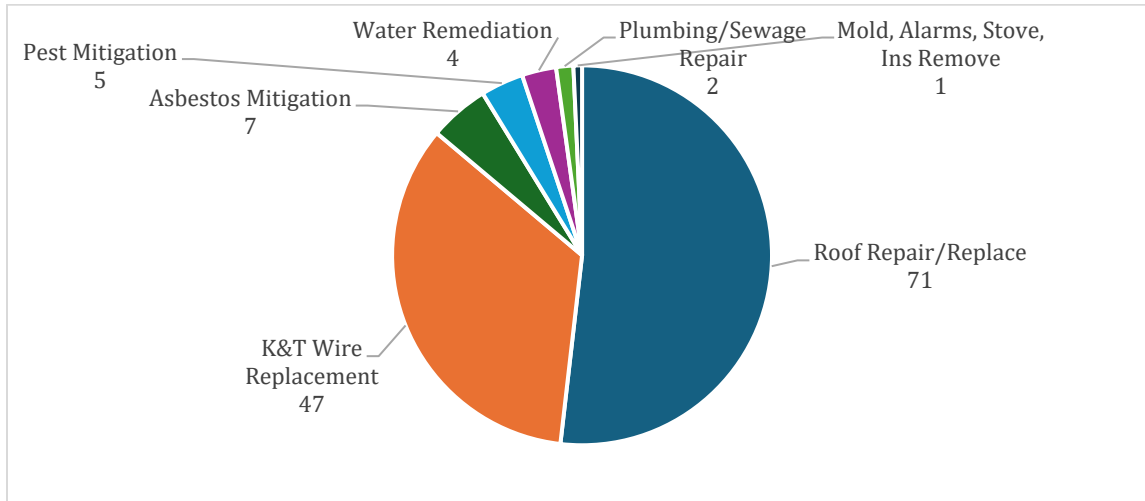
2.3.2 Measure Mix

Allowable measures in the H&S Pilot Program are defined as any measure within the allowance necessary to mitigate a barrier to perform weatherization on a home. Across the 115 projects completed during the evaluation period the following list of measures were implemented 140 times to mitigate barriers to weatherization.

1. Roof (repair and/or replace)
2. Knob and tube wiring replacement
3. Asbestos mitigation
4. Pest mitigation
5. Water remediation
6. Plumbing/sewage repair
7. Insulation removal
8. Mold remediation
9. Smoke alarms
10. Stove replacement

The ten unique measures were not installed at the same frequency throughout the 115 projects completed during the evaluation period. As shown in the figure below, roof repair/replacement and knob and tube wiring accounted for over 84% of all measure installations.

Figure 3. H&S Barrier Mitigation Measure Mix by Installation Quantity



Frequency of installation trends carried through to overall costs by measure, as shown in the table below, where these two measures made up 90.7% of spending on H&S measures.

Table 6. H&S Barrier Mitigation Measure Mix by Cost

Measure	Cost (\$)	Percentage of Total Cost
Roof Repair/Replace	205,029.79	47.7%
K&T Wire Replacement	184,818.57	43.0%
Asbestos Mitigation	13,365.00	3.1%
Pest Mitigation	2,730.75	0.6%
Water Remediation	2,965.00	0.7%
Plumbing/Sewage Repair	11,235.00	2.6%
Insulation Removal	870.00	0.2%
Mold Remediation	6,045.00	1.4%
Smoke Alarms	1,958.00	0.5%
Stove Replacement	791.00	0.2%
Total	429,808.11	100%

The dominance of roof repairs and knob and tube wire replacement reinforces the program design approach that identified unsafe roofing and electric wiring as the main barriers to successful weatherization projects.

2.4 Results – Pilot Program Level

This section contains the results of an analysis on energy savings, customer and home demographics, and project comprehensiveness. This analysis was conducted on H&S Pilot Program data provided by Columbia Gas through their system of record for projects completed during the evaluation period.

2.4.1 Energy Savings Analysis

Columbia Gas provides savings at the project level to the LIURP statewide evaluator (SWE) on an annual basis. Project savings were calculated by Columbia Gas using 12 months of pre- and post-usage data and the PRISM® software package¹ to weather normalize results. GEEG analyzed the savings for H&S projects in 2022, 2023, and 2024.² Projects that had pre-or post- usage that was zero or uncalculated were removed from the analysis. The following figure shows the distribution of annual savings percentages for H&S projects for the three-year analysis period.

Figure 4. Distribution of Annual Percentage Savings for H&S Projects from 2022 to 2024

This graph shows that 98 of the 117 H&S projects, or 84% of projects, had observed annual savings, with 31 H&S projects having annual savings of over 30%. The following table provides an overview of savings trends for H&S Projects, including average and median savings, as well as the total percentage saved across the three-year time frame.

¹ <https://marean.mycpanel.princeton.edu/Details.html>

² 2025 data was not yet available as it requires 12 months of post-usage analysis and additional processing time.

Table 7. H&S Project Savings Trends

Year	2022	2023	2024	Total
Count	21	33	63	117
Avg Save %	14%	14%	20%	17%
Avg Save Dth	23.0	30.4	36.0	32.1
Total % Save	14%	18%	20%	19%
Median % Save	15%	22%	19%	19%
Min % Save	-13%	-116%	-20%	-116%
Max % Save	38%	40%	49%	49%

As stated in the project eligibility criteria, Columbia Gas targeted usage reductions of 18% for their H&S projects. At the start of the H&S Program in 2022, per-project and total population savings were 14%, which was lower than the targeted 18%. As the program continued and participation increased, savings improved on an individual project and overall basis, with total population savings reaching the targeted 18% in 2023 and 20% in 2024. Average savings in 2023 were skewed downward by a single project that had a 116% increase in usage. Without the outlier project, average per project savings in 2023 were 18%. **For the three-year analysis period, Columbia Gas exceeded its target of 18% savings for the H&S Program, with total population savings and median project savings of 19%.**

2.4.2 Demographics Analysis

Throughout the entire H&S Pilot Program life cycle, from application to completion, various data points are collected on customer and property demographics. The table below highlights the important data points for a low-income program with a focus on health and safety.

Table 8. H&S Pilot Program Demographics Overview January '22 - September '24

Demographic Data Point	Pilot Program Average
Participant Annual Income	\$17,751
Poverty Level Percentage	85%
Total Household Occupants	3
CFM50 Reduction Percentage	37%
Year Home Constructed	1919
Home Square Footage	1821

2.5 Results - LIURP H&S and LIURP Comparative Analysis

2.5.1 Energy Savings Comparison

The following figure and table provide a summary of annual savings results for non-H&S projects and is comparable to H&S project results

Table 7 . Results are presented for each year that the H&S pilot was active as well as for the three-year total. A negative savings value means that the customer had an increase in natural gas usage.

Figure 5. Distribution of Annual Percentage Savings for non-H&S Projects from 2022 to 2024

Similar to H&S projects, the non-H&S projects exhibit a normal distribution with 83% of projects having positive savings results and 23% of projects getting over 30% savings. Unlike H&S projects, savings trends for non-HS projects were consistent from 2022 to 2023 with a dip in savings observed in 2024, as shown in the following table.

Table 9. Non-H&S Project Savings Trends

Year	2022	2023	2024	Total
Count	483	300	246	1,029
Avg Save %	17%	17%	15%	16%
Avg Save Dth	27.3	26.2	26.3	26.7
Total % Save	18%	18%	16%	17%
Median % Save	15%	16%	14%	15%

Min % Save	-68%	-80%	-76%	-80%
Max % Save	94%	97%	65%	97%

The following three figures directly compare savings trends for non-H&S projects to H&S projects.

Figure 6. 20224 to 2025 Average Project Savings Percentage

H&S projects had a slightly higher average savings percentage per project across 2022 to 2024. However, average savings for H&S projects were 25% higher than non-H&S projects in 2024.

Figure 7. 2022 to 2024 Average Project Savings Decatherms

On an absolute basis, H&S project savings exhibited a strong upwards trend from 2022 to 2024, with 2024 saving per project nearly 33% higher for H&S projects than non-H&S projects.

Figure 8.2024 to 2024 Median Project Savings Percentage

H&S projects also had higher median savings than non-H&S projects, especially as the H&S Program increased its activity in 2023 and 2024. **Altogether, there is clear evidence that H&S projects are saving more energy per job and achieving higher average and median percentage savings than non-H&S jobs.**

2.5.2 Demographics Comparison

To evaluate the effectiveness of the H&S Pilot Program a comparative analysis of the customer and home demographics served was conducted against the homes served through the traditional LIURP during the evaluation period.

In the weatherization industry it is often theorized that a primary reason for the importance of programs like the H&S Pilot Program is as household income decreases, barriers to weatherization increase. The table below shows the income demographics of H&S Pilot Program participants that had significant barriers to weatherization versus participants in the traditional LIURP that did not. The data shows a lower average annual income and percentage of poverty level served in the H&S Pilot Program, while maintaining the same average number of total household occupants. **The H&S Pilot Program is serving, on average, a lower income customer base than traditional LIURP further validates the importance of the program funding need to remove barriers to weatherization for this customer base.**

Table 10. H&S Pilot Program vs. Traditional LIURP – Participant Income Demographics

Demographic Data Point	H&S Pilot Program Participant Average	Traditional LIURP Participant Average
Total Household Occupants	3	3
Annual Income	\$17,751	\$19,084
Poverty Level Percentage	85%	91%

The post-installation performance of the home was also collected and analyzed on H&S Pilot Program participants and traditional LIURP participants. The table below shows the CFM50 air leakage test results and percentage reductions for participants in both programs. While the homes of participants in the H&S Pilot Program initially had much higher air leakage rates, their post-installation results showed lower air leakage rates. This shows that **once the funding is provided to remove critical barriers, these homes benefit greatly from weatherization services, with larger opportunity for LIURP services versus homes that are able to receive those services without extensive H&S barrier mitigation.**

Table 11. H&S Pilot Program vs. Traditional LIURP - Pre/Post Air Leakage Results

Air Leakage Result Category	H&S Pilot Program Participant Average	Traditional LIURP Participant Average
Initial Air Leakage (CFM50)	7,636	6,179
Post Air Leakage (CFM50)	4,830	4,942
Air Leakage Reduction (CFM50)	2,806	1,237
Air Leakage Reduction (%)	37%	20%

Lastly, the average age and square footage of the participant’s homes was analyzed between the H&S Pilot Program and traditional LIURP participants, as shown in the table below. This shows that the average year of home constructions was in the same time period between programs and the square footage of H&S Pilot Program participant’s homes was lower than that of traditional LIURP participant’s homes, ruling out that the air leakage results shown in the table above are not a result of an older or larger housing stock among H&S Pilot Program participants.

Table 12. H&S Pilot Program vs. Traditional LIURP - Participant Home Age and Size

Participant Home Characteristic	H&S Pilot Program Participant Average	Traditional LIURP Participant Average
---------------------------------	---------------------------------------	---------------------------------------

Year Constructed	1919	1921
Square Footage	1,821	1,945

2.6 Summary – Findings and Results

The list below summarizes the findings and results of the evaluation.

- Anecdotally customers are satisfied with the program. The small survey response sample size shows need for improvement in customer satisfaction survey collection.
- The vast majority (76.5%) of pilot projects passed post inspection with the 23.5% of failed projects being non-emergency failures.
- The post inspectors for the program have a uniform protocol to effectively address any found gas leaks, but not in how they score (pass/fail) a project with a found gas leak.
- The current process of paper collection and a scanned upload entered into the data collection system for inspection reports makes analysis and trend identification difficult.
- Throughout the evaluation period the current complex formula resulted in a full allocation allowance that was not necessary to mitigate the H&S barrier(s) to weatherization work in 98% of the projects and 90% of the total projects required over \$1,000 less than the full allocation allowance.
- During the evaluation period a total of 115 customers were eligible to have their health and safety issue remediated and have their homes weatherized. These customers would have otherwise been deferred and not have their homes improved.
- Approximately 91% of projects used the pilot funding to repair roofs or replace unsafe knob and tube wiring.
- For the three-year analysis period, Columbia Gas exceeded its target of 18% savings for the H&S Program, with total population savings and median project savings of 19%.
- There is clear evidence that H&S projects are saving more energy per job and achieving higher average and median percentage savings than traditional LIURP jobs.
- The H&S Pilot Program is serving, on average, a lower income customer base than traditional LIURP which further validates the importance of the program funding need to remove barriers to weatherization for this customer base.
- H&S projects resulted in a 17% greater air leakage reduction than traditional LIURP projects.

2.7 Recommendations

The primary resulting recommendation of this evaluation is to continue operating the Health and Safety Pilot Program and/or incorporate the practices of the pilot into the traditional LIURP as an operating component. The findings of this evaluation show the removal of existing health and safety barriers has been successful in serving more customers that otherwise would not be served, decreasing energy consumption, and improving the overall health, safety, and comfort of low-income Columbia Gas customers.

In addition to this primary recommendation, we have the following recommendations based on the findings of this evaluation.

Customer satisfaction survey – (1) Conduct a customer satisfaction survey as part of the post-inspection process and report; (2) Send customers a follow up email containing a customer satisfaction survey link to collect responses electronically, rather than by mail.

Post inspection reports – (1) Include customer feedback as part of the post inspection report; (2) Ensure consistency in inspection outcomes across inspector when possible; (3) Consider a non-paper and scan method for collecting post inspection data.

Budget allocation – (1) Consider a simplified H&S allocation formula; (2) Institute a request for additional spending process to account for projects needing a higher allocation as a result of a simplified allocation formula.

Columbia Gas Emergency Repair Program Report

2025

Spending - \$993,346

Admin Costs - \$129,539

Measures - \$863,807

Completed Jobs – 284

Average Cost Per Job - \$3,497.70

2026

Projected Spend - \$1,000,000

Projected # of Jobs to be completed – 280

Columbia LIURP Needs Assessment

The number of estimated low-income customers, including a reference to the source of this information and a copy of the methodology used. **89,423**

County	Total Population	Columbia Residential Customer count	% of County Columbia Serves	Total Population <150%	CPA Estimate at equal % of total
ADAMS	40841	15508	37.97%	7783	2955
ALLEGHENY	545802	103240	18.92%	119697	22641
ARMSTRONG	28035	847	3.02%	7153	216
BEAVER	72257	36248	50.17%	14587	7318
BEDFORD	19750	10	0.05%	5493	3
BUTLER	80824	9668	11.96%	14398	1722
CENTRE	59013	14395	24.39%	17768	4334
CLARION	15049	3506	23.30%	4542	1058
ELK	13325	31	0.23%	3321	8
FAYETTE	55182	21915	39.71%	16752	6653
FRANKLIN	63510	4931	7.76%	13529	1050
FULTON	6339	3	0.05%	1481	1
GREENE	14324	2638	18.42%	3396	625
INDIANA	32487	555	1.71%	10162	174
JEFFERSON	18344	347	1.89%	5230	99
LAWRENCE	36121	17998	49.83%	9662	4814
MCKEAN	16369	3106	18.97%	4865	923
MERCER	46524	29	0.06%	12530	8
SOMERSET	29344	4771	16.26%	7559	1229
VENANGO	21397	675	3.15%	6282	198
WARREN	16123	2355	14.61%	4396	642
WASHINGTON	88505	44742	50.55%	18866	9537
WESTMORELAND	154979	20951	13.52%	32635	4412
YORK	181583	106574	58.69%	32036	18802
Grand Total		415043			89423

The number of Columbia customers who heat with natural gas. **412,993**

The number of Confirmed Low-Income (CLI) customers, including customers who self-identify or who have been identified as having incomes at or below 150% of the FPIG. **58,291**

The number of CLI customers who have consumption greater than 170 therms. **14,248**
Number of these customers that:

- Received LIURP within the past seven years. **1,340**
- Ineligible for LIURP due to other reasons (e.g., deferred due to health and safety issues). Each issue and the number of customers it applies to should be identified individually. **772**

Columbia LIURP Needs Assessment

Already Weatherized	7
Did Not Provide Documentation	2
Has Not Lived in House 12 Months	1
Low Consumption	1
Mobile Home	2
No Landlord Agreement	65
No Response	292
Customer Moved	21
Customer Request	37
Customer Service Off	21
Did Not Update Landlord Information	2
Duplicate	28
Health Reasons	20
Knob & Tube Wiring	18
Lead Inactive	33
Moisture in Basement	24
No Show	7
No Work to be Done	24
Other	54
Over Income	19
Property For Sale	3
Property Not Weatherizable	44
Repairs Not Completed by Homeowner	4
Repairs Not Completed by Landlord	29
Roof Leaks	14

- Renters. **7,877**

The number of known customers with household income between 151% and 200% of the FPIG **16,937**

The number of customers between 151% and 200% of the FPIG with consumption greater than 170 therms. **3,568**

- Number of these customers that:
- Received LIURP within the past seven years.**59**
- Ineligible for LIURP due to other reasons (e.g., deferred due to health and safety issues). Each issue and the number of customers it applies to should be identified individually.**49**

Columbia LIURP Needs Assessment

Reason	# of Customers
No Response by customer	27
Customer Request	3
Landlord did not agree	2
Moisture in Basement	2
Knob & Tube wiring	2
Customer Moved	1
Other	7
Multiple H&S issues	3
Property owner did not make repairs	2

- Renters. **1,107**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing documents upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant) VIA E-MAIL:

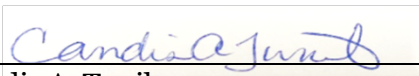
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Date: April 24, 2026



Candis A. Tunilo