



May 5, 2026

VIA E-File

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

Re: Peoples Natural Gas Company LLC – Petition to Amend its Universal Service and Energy Conservation Plan, Docket Nos. P-2024-3052324, M-2018-3003177, M-2020-3021343

Comments of CAUSE-PA

Dear Secretary Homsher:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) submits these Comments in response to the Supplemental Information filed by Peoples Natural Gas Company (Peoples) on April 15, 2026, at the above referenced dockets. CAUSE-PA is deeply disappointed that the additional clarifications requested by the Commission have now resulted in Peoples' effective abandonment of an automated enrollment procedure expressly designed to ease unnecessary and duplicative administrative burden on low income households carrying substantial pre-program debts.

As part of the 2023 Peoples rate proceeding, CAUSE-PA entered a Stipulation with Peoples, in consideration for not opposing the Joint Petition for Nonunanimous Settlement.¹ The

¹ Pa PUC v. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549, Low Income Stipulation (Filed May 30, 2024) at I.A.6; (Final Order issued September 12, 2024).

Stipulation required Peoples to seek authorization to amend its 2019 USECP to amend its Universal Service and Energy Conservation Plan (USECP) to allow for automatic enrollment in CAP for LIHEAP recipients with post-grant arrearages of at least \$300.² On September 12, 2024, the Commission approved the Stipulation as filed, explicitly finding 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 customers.”³

Peoples complied with the Stipulation by filing tariff revisions on September 26, 2024, and by submitting its Petition on December 11, 2024.⁴

On April 24, 2025, the Commission rejected Peoples’ Petition (April 2025 Order), without prejudice, and identified a number of areas where the Petition needed further detail. Although the Commission initially rejected the Petition without prejudice in its April 24, 2025 Order, it reversed course on reconsideration. In its October 9, 2025 Order, the Commission agreed with CAUSE-PA that Peoples USECP must align with its approved tariff and directed Peoples to consult with stakeholders and file an amended Petition that addressed the Commission’s concerns while remaining consistent with the tariff already approved by the Commission.⁵

Following extensive stakeholder engagement through its Universal Service Advisory Group (USAG), Peoples timely filed its Amended Petition on January 7, 2026. CAUSE-PA supported that filing, based on substantial evidence.⁶ Without reiterating our support in full, we

² Id., Low Income Stipulation at I.B.15.

³ Id., Final Order at 62.

⁴ The updates to Peoples’ USECP filed on November 26, 2024 were approved by Secretarial Letter dated December 13, 2024.

⁵ October 2025 Order at 7.

⁶ See Amended Petition of Peoples Natural Gas Company, LLC to Amend Its Current Universal Service and Energy Conservation Plan 2019-2024, at Docket Nos. P-2024-3052324, et al., CAUSE-PA Answer to Amended Petition (Filed January 27, 2026).

emphasize here that CAP enrollment substantially improves collections and termination rates – in turn driving benefits to all customers. Nevertheless, Peoples CAP enrollment has declined 13% since 2019 – despite rising termination rates and arrearage levels.⁷ Peoples’ CAP termination rate in 2023 was just over 5%, compared to 12% for low income customers not enrolled in CAP. Although confirmed low income customers represented 7.9% of residential customers, they accounted for 17.4% of Peoples’ involuntary terminations.⁸

On March 26, 2026 the Commission issued an Order (March 2026 Order) requesting further additional supplemental information. In the Commission’s March 2026 Order, it requested the following information from Peoples:

- 1) How it will amend its proposed Welcome Letter for auto-enrolled customers to reflect that they may opt-out of CAP within 90 days and have the ability to enroll again without penalty (i.e., 12-month stay-out provision),
- 2) The feasibility of adopting CAUSE-PA’s recommendation that Peoples track the reasons auto-enrolled customers opt-out of CAP and the timing of the opt-out request relative to the 90-day window,
- 3) Estimates of anticipated reductions in costs related to collection activity and gross residential write-offs through the adoption of CAP auto-enrollments, and
- 4) Whether arrears accrued in CAP prior to opting out of the program will be eligible for a utility payment arrangement and what steps Peoples will take to guarantee these customers will not be auto-enrolled in CAP again.⁹

The March 2026 Order directed Peoples to file this Supplemental Information within 20 days of the Order and indicated that Comments would be due 20 days after that.

Peoples filed its Supplemental Information on April 15, 2026. In its filing, Peoples addressed the Commission’s concerns by effectively withdrawing its auto-enrollment proposal.¹⁰ Instead, the Company proposed a streamlined CAP enrollment process for customers who (1)

⁷ Pa PUC v. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549, Main Brief of CAUSE-PA at 22-28.

⁸ Id.

⁹ March 2026 Order at 17-18.

¹⁰ Supplemental Information at ¶ 2.

received a LIHEAP grant, (2) agreed to share their data through the LIHEAP Data Sharing agreement with the Pennsylvania Department of Human Service (DHS), and (3) have a balance of at least \$300 after receipt of a LIHEAP grant.¹¹ Peoples also submitted proposed language changes to its USECP to reflect this process.

CAUSE-PA is confounded by the shifting goalposts in the Commission's review of a common-sense, consensus-based automated enrollment procedure that leverages available data to improve access to rate assistance and arrearage management for LIHEAP recipients carrying a substantial level of arrears after application of a LIHEAP grant. At a time when termination rates are at a record high and enrollment rates remain persistently low, CAUSE-PA fails to understand why the Commission continues to put up roadblocks to the implementation of data driven solutions that would provide immediate rate relief and debt forgiveness to thousands of low income households carrying substantial levels of debt. These households are known to be eligible and have indicated a desire to enroll in Peoples CAP at the time they applied for LIHEAP.

At this point, Peoples' proposal bears little resemblance to the automated enrollment provisions envisioned by the Stipulation. While CAUSE-PA strongly supports Peoples' efforts to enhance outreach to LIHEAP recipients and to streamline their enrollment in CAP, that is not what the Stipulation contemplated. The Stipulation required Peoples to pursue automated enrollment for LIHEAP recipients with demonstrated arrears – recognizing both the depth of need among LIHEAP recipients and the administrative barriers that routinely prevent successful enrollment into CAP.

CAUSE-PA submits that no further Commission approval is required for what Peoples now proposes. The streamlined affirmative enrollment process described in Peoples' Supplemental

¹¹ Id. at ¶ 4.

Information is already authorized by existing Commission policy and by the LIHEAP Data Sharing framework that the Commission itself helped develop.¹² If Peoples intends to pursue streamlined affirmative enrollment, it should implement those procedures immediately – for all LIHEAP recipients, regardless of pre-program arrears. However, doing so is not a substitute for and should not displace efforts to implement an automated enrollment process for LIHEAP recipients with significant arrears following application of a LIHEAP grant.

Through its 2023 Review of Universal Service Programs, the Commission participated in the development of language of the Data Sharing Agreement with DHS,¹³ and has applauded the efforts that went into the development of these agreements. Specifically, the Commission has recognized that leveraging LIHEAP data “promotes efficiencies and eliminates paperwork redundancies” – ultimately resulting in “cost savings and reduce[ed] ‘red tape’ bureaucracy to the benefit of customers and utilities alike.”¹⁴ The Public Utility Code further mandates that a public utility charge consumers the most advantageous rate available – yet thousands of confirmed low income households remain unenrolled in CAP.¹⁵ New tools, such as LIHEAP Data Sharing, are now available and should be leveraged to the fullest extent possible to ensure all eligible households are receiving the most advantageous rate available through CAP.

In conjunction with the Commission’s March 2026 Order, Chairman DeFrank noted concern that auto-enrollment could prevent a consumer from receiving a Commission approved payment arrangement.¹⁶ Originally stemming from Chapter 14, which has since sunset, this

¹² 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Docket No. M-2023-3038944, Order at 5. (Issued June 13, 2024).

¹³ Id.; Order at 2.

¹⁴ Id.; Order at 5; Joint Statement of Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss.

¹⁵ 66 Pa. Code § 1303; Section 1303 of the Public Utility Code requires that a public utility with more than one rate for service must compute bills under the rate most advantageous to the customer.

¹⁶ Petition of Peoples Natural Gas Company LLC to Amend 2019-2024 Universal Service and Energy Conservation Plan, Docket No. P-2024-3052324, Statement of Chairman Stephen M. DeFrank. (Issued March 26, 2026).

restriction is a policy choice made by the Commission - one it could choose to waive if it is, in fact, concerned that auto-enrolled customers are losing access to a benefit. However, coming from those who work closely with low income customers every day across the Commonwealth, potential access to a future payment arrangement (itself evidence of unaffordable bills) would likely not outweigh the benefits of enrolling in a program designed to obviate the need for such an arrangement. CAP provides an alternative path to collections – one designed to address the unique needs of low income customers.

As clearly indicated in Peoples original and Amended Petitions, the customers eligible for auto-enrollment already have significant arrearages and would immediately benefit from enrollment into CAP. Peoples, through its proposal of a 90-day grace period, has already proposed to retain those customers’ ability to enter into a payment arrangement with the Company on in-program arrears, provided they opt out within the 90-day time period.¹⁷ The Commission could do the same.

CAUSE-PA is deeply concerned that the Commission’s stated concerns about auto-enrollment do not recognize the realities of day-to-day life for households experiencing poverty at the levels necessary to qualify for LIHEAP and CAP.¹⁸ Households who are eligible for LIHEAP spend an inordinate amount of time filling out forms, submitting paperwork, and fighting through all sorts of red tape in an attempt to prove they need assistance. It is not just LIHEAP and CAP that these households are navigating. Restrictions on SNAP and Medical Assistance have increased,¹⁹ and many LIHEAP eligible households rely on SSI income, indicating significant

¹⁷ Amended Petition at ¶ 22.

¹⁸ See Petition of Peoples Natural Gas Company LLC to Amend 2019-2024 Universal Service and Energy Conservation Plan, Docket No. P-2024-3052324, Statements of Chairman Stephen M. DeFrank & Commissioner John E. Coleman, Jr. (Issued March 26, 2026).

¹⁹ U.S. Department of Agriculture, Food & Nutrition Service, SNAP: One Big Beautiful Bill Act of 2025 Implementation (2025), <https://www.fns.usda.gov/snap/obbb-implementation>.

disabilities in the home.²⁰ Indeed, the vast majority of LIHEAP recipients are seniors, families with children under 5, and individuals with a disability.²¹ These households are asked to prove over and over again that they deserve access to basic human needs. Further, given the volume of applications and programs that low income households are told to apply for – often at a time when the household is experiencing an acute financial hardship – it is very common for consumers to be confused about the difference between CAP and LIHEAP. Households are often referred to several programs at one time, and determining what they have successfully applied for or enrolled in can be complicated.

Peoples’ auto-enrollment proposal – set forth in its initial petition and further refined in its amended petition – recognizes this stark reality and proposed a common-sense solution that would leverage new data to improve access to and enrollment of eligible households in its CAP rate.

As CAUSE-PA has argued consistently through-out this proceeding, Peoples’ automated enrollment proposal would 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. The Commission must allow utility Companies to further expand their use of LIHEAP data in their efforts to reach the thousands of low income households currently struggling with unaffordable bills.

²⁰ 2024 USR at 50; 30% of gas company CAP households receive income from employment, 30% are retired and rely on social security and/or pensions, and 15% rely on disability income.

²¹ NEUAC Pennsylvania LIHEAP FY 2024 Profile; available at <https://neuac.org/wp-content/uploads/2026/01/Pennsylvania-State-Sheet-FY24.pdf>

Respectfully Submitted,



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CC: *Secretary Homsher (Cover Letter and Certificate of Service only)*
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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-2024-3052324
:

Certificate of Service

I hereby certify that I have this day served copies of the **Comments of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania** 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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