



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

IN REPLY, PLEASE
REFER TO OUR FILE

PUC Docket No.
M-2026-3063201

July 8, 2026

Pennsylvania Department of Human Services
Division of Federal Programs and Program Management
CoPA HUB, Suite 240/250
PO BOX 2675
Harrisburg, PA 17015-2675
Via email: LIHEAPmail@pa.gov , Bwhorl@pa.gov, Kmyricks@pa.gov

**RE: Comments of the Pennsylvania Public Utility Commission
to the Department of Human Services Regarding the
Proposed Fiscal Year 2027 Low-Income Home Energy
Assistance Program State Plan**

Enclosed please find the comments of the Pennsylvania Public Utility Commission (PUC) regarding the proposed Fiscal Year (FY) 2027 Low-Income Home Energy Assistance program (LIHEAP) State Plan posted by the Pennsylvania Department of Human services at:

www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance_liheap/fy-2027-liheap-proposed-state-plan.pdf

The PUC appreciates the opportunity to comment on the proposed FY 2027 LIHEAP State Plan. Please do not hesitate to contact Jennifer Johnson, Jennijohn@pa.gov, Bureau of Consumer Services; Stephanie Wilson, Stephwilson@pa.gov, Law Bureau; or Louise Fink Smith, finksmith@pa.gov, Law Bureau, should you require any additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Louise Fink Smith", is written over a horizontal line.

Louise Fink Smith, Esq.
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Assistant Counsel

cc: Stephen M. DeFrank, Chairman, PUC
Kimberly Barrow, Vice Chair, PUC
Kathryn L. Zerfuss, Commissioner, PUC
John F. Coleman, Jr., Commissioner, PUC
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**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
Harrisburg, PA 17020**

**PROPOSED LOW-INCOME HOME ENERGY
ASSISTANCE STATE PLAN FOR FISCAL YEAR 2027**

**Comments
of the
Pennsylvania Public Utility Commission
PUC Docket No. M-2026-3063201**

The Pennsylvania Department of Human Services (DHS) is the designated Pennsylvania agency with the responsibility to oversee Pennsylvania's obligations under the Federal Low-Income Home Energy Assistance Program (LIHEAP) statute, 42 U.S.C. §§ 8621—8630 (relating to low-income home energy assistance). DHS has requested public comments on Pennsylvania's proposed Fiscal Year (FY) 2027 LIHEAP State Plan (Proposed 2027 Plan).¹

DHS, the Department of Community and Economic Development (DCED), and the Pennsylvania Public Utility Commission (PUC) share common goals of assisting low-income residential customers who experience difficulty paying the full residential tariff rate for their energy service and helping these customers use and conserve energy safely. DCED's Weatherization Assistance Program (WAP) empowers community organizations to help low-income recipients make their homes more energy efficient. With rising energy costs increasing affordability concerns for Pennsylvania families, energy assistance programs are a vital lifeline for financially struggling households to maintain utility services.

¹ See https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance_liheap/fy-2027-liheap-proposed-state-plan.pdf.

The Public Utility Code, 66 Pa.C.S. §§ 101—3316, charges the PUC with overseeing the universal service and energy conservation programs of natural gas public utilities and electric public utilities.² These programs are intended to make jurisdictional energy service more affordable for low-income residents. With these programs, and consistent with the PUC’s mission, the PUC strives to balance the needs of consumers and public utilities, to ensure safe and reliable public utility service at reasonable rates, to protect the public interest, to educate consumers to make independent and informed utility choices, to further economic development, and to foster new technologies and competitive markets in an environmentally sound manner.

With these shared goals and obligations in mind, the PUC hereby respectfully submits these formal Comments to the Proposed 2027 Plan. The PUC supports the following proposals in the Proposed 2027 Plan:

- **Setting the LIHEAP Cash benefit amounts and the Crisis benefit amounts (Proposed 2027 Plan at iii)** – DHS estimates a budget of \$224 million from the Federal block grant for FY 2027 and anticipates carrying forward \$20 million from FY 2026, resulting in a total budget of approximately \$244 million. DHS proposes that 15% of the block grant will be allocated to DCED for the WAP and up to 10% of the block grant will be allocated for administrative costs, leaving an adjusted minimum total of \$188 million available for LIHEAP benefits. For FY

² Such universal service programs include Pennsylvania’s statutorily mandated and PUC-approved customer assistance programs (CAPs), low-income usage reduction programs (LIURP), customer assistance referral and evaluation programs (CARES), and hardship funds for electric distribution companies and natural gas distribution companies. The United States Department of Health and Human Services recognizes State-mandated low-income energy assistance programs, such as Pennsylvania’s universal service programs, as “leveraged resources” under 42 U.S.C. § 8626a(b)(2)(B)(i) (relating to incentive program for leveraging non-Federal resources). The statutorily mandated and PUC-approved universal service programs fulfill an important role in assisting low-income households maintain vital public utility services for electricity and natural gas and are, nevertheless, “leveraging resources.” *See, e.g.,* PUC Comments to Proposed FY 2026 LIHEAP State Plan, PUC Docket No. M-2025-3056081, at 2, FN 2.

2027, DHS proposes maintaining the minimum Cash grant at \$200 and the maximum Cash grant at \$1,000. DHS also proposes to maintain the minimum Crisis grant at \$25 and the maximum Crisis grant at \$1,000. The PUC supports this approach given the uncertainty of the LIHEAP funding allocation for FY 2027. The PUC continues to recommend that DHS set both the minimum Cash and Crisis grant amounts and the maximum Cash and Crisis grant amounts as high as possible within available resources to ensure meaningful assistance for low-income households facing rising energy costs.

- **Keeping LIHEAP open through April 9, 2027 (Proposed 2027 Plan at iii)** – DHS proposes to keep LIHEAP open past the end of the PUC’s restrictions on winter terminations (*i.e.*, March 31, 2027) but notes that it could lengthen or shorten the program depending on the availability of funds. The PUC supports DHS’ proposal to keep LIHEAP open past the end of the PUC’s restrictions on winter terminations by electric distribution companies, natural gas distribution companies, and city natural gas distribution operations (currently March 31, 2027).³ 52 Pa. Code § 56.100(b) (relating to winter termination procedures of electric distribution and natural gas distribution utilities). Extending LIHEAP into April can help eligible households avoid abrupt termination of energy services at the end of the restriction period for winter terminations. The PUC encourages

³ The PUC entered a Statement of Policy to provide certainty to public utilities, consumers, and all affected stakeholders regarding the continuing viability of its regulations in 52 Pa. Code Chapter 56 after the sunset of 66 Pa.C.S. Chapter 14 and the PUC’s intention to continue to enforce many important Chapter 56 provisions until such time as the General Assembly takes legislative action or it becomes necessary for the PUC to take action regarding the Chapter 56 regulations including the winter moratorium. The Policy Statement expressly states the PUC’s intention to enforce the termination restrictions in 52 Pa. Code § 56.100(b). *See Sunset of Chapter 14, Title 66 of the Pennsylvania Public Utility Code*, Docket No. M-2024-3052328, (Order entered on December 24, 2024); 55 Pa.B. 268 (January 11, 2025). The PUC has since commenced a *Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56*, PUC Docket No. L-2025-3058767. The Notice of Proposed Rulemaking was published at 56 Pa.B. 3136 (May 30, 2026). Comments are due August 28, 2026, with reply comments due October 13, 2026.

DHS to keep LIHEAP open as long as funding permits, including into the summer months if feasible.

- **Continuing to allow unspent LIHEAP funds to be applied to CAP pre-program arrearages (Proposed 2027 Plan at B-13-14)** – DHS proposes to continue to allow a recipient’s unspent LIHEAP funds to be applied to the recipient’s CAP pre-program arrearages noting that the unspent LIHEAP funds may not be so applied unless funds remain after a two-year period of applying funds to the recipient’s asked-to-pay amount. Remaining unspent funds must be returned to DHS. The PUC supports the proposal to allow a recipient’s unspent LIHEAP funds to be applied to the recipient’s CAP pre-program arrearages. This policy reduces the risk of loss of public utility service to low-income households and contributes to the reduction of low-income customer debt, reduces the amount of CAP costs recovered from ratepayers, and maximizes the use of LIHEAP funding.
- **Continuing the PA LIHEAP Deferral Program if funding permits (Proposed 2027 Plan at C-8 - C-9)** – DHS proposes to continue the Deferral Program if funding permits. The Deferral Program performs repairs to homes to address structural or health-related issues that made the dwellings previously ineligible for weatherization. The program also provides data to DCED and public utilities regarding the costs and effectiveness of measures to eliminate common barriers to completing energy conservation assistance projects. The PUC supports continuation of the Deferral Program as it will increase energy savings, reduce costs, and provide safe and healthy environments for income-eligible Pennsylvania households.
- **Continuing the PA LIHEAP Clean and Tune Program if funding permits (Proposed 2027 Plan at C-9)** – DHS proposes to continue the Clean and Tune

Program if funding permits. The Clean and Tune Program provides non-emergency preventative maintenance services and client education to persons in eligible households by preserving the integrity of the household's heating system, protecting the health and safety of the inhabitants of the residence. The PUC supports continuation of the Clean and Tune Program. The preventive services and client education tend to reduce the need for more costly emergency services.

- **Continuing the LIHEAP Emergency Services Cooling Program if funding permits (Proposed 2027 Plan at C-9 - C-10)** – DHS proposes substantially similar provisions for its LIHEAP Emergency Services Cooling Program for FY 2027 (Proposed 2027 Plan at C-9-C-10) as it implemented for FY 2026 (Final 2026 Plan C-9-C-10).⁴ The PUC supports DHS' proposal to continue the LIHEAP Emergency Services Cooling Program if funding permits. This program addresses cooling emergencies during extreme summer heat that can be life-threatening, especially for the elderly, infants, and other vulnerable populations.
- **Inclusion of air conditioning system repair and replacement as a LIHEAP emergency service (Proposed 2027 Plan at viii and C-4)** – DHS proposes to include the repair or replacement of a home's air conditioning (A/C) system when the system is integral to, and integrated within the home's overall heating, ventilation, and air conditioning (HVAC) system. The PUC supports DHS' proposal regarding inclusion of A/C system repair and replacement as a LIHEAP emergency service. In the PUC's recent Low-Income Usage Reduction Program (LIURP) rulemaking, the PUC recognized space-cooling as a separate category of customer need that can be addressed by LIURP in conjunction with energy

⁴ https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance_liheap/2026-liheap-state-plan.pdf (viewed June 22, 2026).

efficiency measures in appropriate circumstances.⁵ The inclusion of A/C system repair and replacement as an emergency service in the FY 2027 Plan will provide essential and potentially life-saving cooling assistance to eligible households, particularly vulnerable households, during the summer months.

- **Continue LIHEAP Data Sharing with Public Utilities (Proposed 2027 Plan at vi)** – DHS proposes to continue LIHEAP Data Sharing. DHS implemented LIHEAP Data Sharing during the FY 2025 LIHEAP season. Data sharing allows households to authorize DHS to share their LIHEAP income and household information with their public utilities for ease of enrollment and recertification in the public utility’s CAP for eligible households. The PUC supports DHS’ proposal to continue LIHEAP Data Sharing. On June 13, 2024, the PUC entered an Order at *2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs*, PUC Docket No. M-2023-3038944, which, *inter alia*, encouraged all energy public utilities to participate in DHS’ LIHEAP Data Sharing and established waivers to public utility universal service and energy conservation plan provisions to allow energy public utilities to enroll or recertify eligible households into CAP, LIURP, or hardship fund programs without the households having to submit new applications or duplicative documentation.

Conclusion

The PUC appreciates the opportunity to comment formally on the proposed FY 2027 LIHEAP State Plan. Please do not hesitate to contact Jennifer Johnson, Bureau of Consumer Services, jennifjohn@pa.gov, Louise Fink Smith, Law Bureau, finksmith@pa.gov, and Stephanie Wilson, Law Bureau, stepwilson@pa.gov, if you have questions or require additional information. An electronic version of these formal

⁵ *Initiative to Review and Revise the Existing Low-Income Usage Reduction Program Regulations at 52 Pa. Code §§ 58.1—58.18*, Final-Form Rulemaking Order, Docket No. L-2016-2557886, (Order entered on March 13, 2025), at 37, 62-53; 55 Pa.B. 8459 (December 13, 2025).

Comments has been emailed to LIHEAPmail@pa.gov, bwhorl@pa.gov, and kmyricks@pa.gov; hard copy has been mailed to:

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Respectively submitted,

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