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August 20, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027
Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2021-3029323

Dear Secretary Homsher:

Enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Addendum to Low Income Usage Reduction Program (Home Comfort) ("Appendix P") with regard to the above-referenced matter. Appendix P to PGW's 2023-2027 Universal Service and Energy Conservation Plan ("USECP") is being submitted consistent with the Commission's March 13, 2025 Final-Form Rulemaking Order at Docket No. L-2016-2557886, *Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1-58.18*. Appendix P incorporates changes to PGW's USECP necessary to comply with the revised LIURP regulations as of December 13, 2026.

Please contact me with any questions or concerns. Copies to be served in accordance with the attached Certificate of Service to the parties in the above-referenced docket.

Sincerely,

/s/ *Lauren M. Burge*

Lauren M. Burge

Enclosure

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Certificate of Service (email only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the enclosed Appendix upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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/s/ *Lauren M. Burge*

Lauren M. Burge, Esq.

Dated: August 20, 2026

Further Revised Universal Service and Energy Conservation Plan 2023-2027
Philadelphia Gas Works
Effective: December 13, 2026

Appendix P:
Addendum to Low Income Usage Reduction Program (Home Comfort)
(USECP pages 19-27)

As directed by the Commission in its March 13, 2025 Final-Form Rulemaking Order, the following Home Comfort program updates and clarifications are made to bring PGW's LIURP into compliance with the final-form regulations from the *Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1—58.18; Docket No. L-2016-2557886* effective December 13, 2026.

Tenant Household Eligibility and Participation

The following addendum is made to the USECP at section 6. Home Comfort Eligibility on pages 20-22.

1. In its outreach to tenants and landlords whose properties are selected for participation in Home Comfort, PGW will provide a copy of the landlord's documented consent form to the landlord and tenant household.
2. PGW and its conservation service providers (CSP) require consent from both the tenant and landlord for the CSPs to perform an energy assessment and install program measures in a rental property. In cases where a landlord does not provide consent, PGW will provide the customer with educational information containing energy-saving tips, and the household will remain eligible for baseload measures that do not require landlord consent.

LIURP Outreach

The following addendum is made to USECP Section 6 on page 20 regarding customer outreach in accordance with 52 Pa. Code § 58.9. PGW will continue to, at least annually, provide a mailing to high usage customers that meet Home Comfort eligibility criteria. These customers will then be contacted by the CSPs in priority order to solicit participation for the program. At least annually, PGW will also provide notice to eligible customers via a mailed letter including a description of program services and eligibility rules, and will provide information on a program website. PGW will provide a copy of this notice to its USAC. The notice letter and website will be translated in Spanish, which is spoken by over five percent of Philadelphians. CSPs will have access to PGW's translation services if the CSP does not have Spanish speaking staff. PGW will consult with the USAC at least annually regarding language needs and potential public service announcements regarding its LIURP.

Prioritization of Program Services

The following addendum to the prioritization approach described on USECP page 21 is made in accordance with 52 Pa. Code § 58.10. PGW will continue to offer program services first to customers with the largest energy usage and greatest opportunities for savings consistent with 52 Pa. Code § 58.10(a)(1). In the unlikely event that customers have the exact same weather normalized usage and opportunity for utility bill reductions, PGW may consider the factors described in 52 Pa. Code § 58.10(a)(2). PGW will also consider the following factors when prioritizing customers for participation: 1) opportunity for coordination with other programs; and 2) opportunity for bill reductions based on the customer's request of services through its open enrollment pathway.

Home Comfort Components

PGW makes the following addendums to the Home Comfort Components section on USECP pages 22 – 23, consistent with 52 Pa. Code § 58.7 and 58.12.

1. The maximum budget allowance that can be spent on health and safety measures and incidental repairs is limited by the Total Resource Cost (TRC) test at the job level. In cases where health and safety issues exist and cannot be corrected cost-effectively by the CSP or through the Health and Safety Pilot exclusion, the home's treatment ends with low-cost measures and the customer receives an info-sheet explaining the health and safety issues, informing the customer of the conditions that must be met for program services to be installed, and referring the customer to organizations that may be able to provide support. PGW will track and maintain a list of dwellings deferred and the reason for the deferral within the past 3 years.
2. Energy education will be provided during the energy audit and upon installation of program measures. PGW will mail CARES packets with LIHEAP applications to all Home Comfort participants. PGW customers will be directed to contact PGW for CARES assistance.

CSP Requirements and Inspections

PGW makes the following addendums to this section on USECP page 23 in accordance with 52 Pa. Code § 58.14a.

1. PGW will appoint an independent inspector to perform quality assurance inspections on 10% of comprehensive weatherization jobs and 5% of jobs that are not comprehensive. PGW monitors the usage for comprehensively weatherized homes to identify irregularities. If a customer's comprehensively weatherized home is found to have usage that increased by at least 15% in the year after treatment, PGW or its inspector will attempt to contact the customer to investigate the increase and may assign the home for an on-site inspection

2. Customers who have complaints about work quality or related issues are asked first to first contact the CSP to address the issue. Customers who need to escalate a concern to PGW are provided the phone number for PGW's Customer Review Unit.

Regulatory Waivers

PGW amends the Section 11 Continuation of Regulatory Waivers of the USECP on page 24 as follows:

1. **52 Pa. Code § 58.5 Administrative Costs:** PGW will continue to operate its LIURP under the PUC approved waiver to the administrative cost cap of 15% set forth in 52 Pa. Code § 58.5(a). PGW will separately track pilot program administrative costs consistent with 52 Pa. Code § 58.5(b). PGW does not consider its pilot program administrative costs to be subject to the existing waiver that remains in place for other LIURP administrative costs.