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October 13, 2026

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – 2nd Floor
Harrisburg, PA 17120

Re: **Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56
L-2025-3058767
Reply Comments**

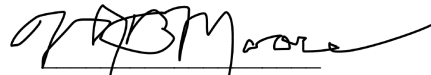
Dear Secretary Homsher:

On behalf of Peoples Natural Gas Company LLC (“Peoples”) please accept the enclosed Reply Comments in response to the Comments filed by various stakeholders to the Pennsylvania Public Utility Commission’s (“Commission”) Notice of Proposed Rulemaking Order (“NOPR Order”) regarding the Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56 entered on February 19, 2026 at the referenced docket.

Peoples also expresses its support for the Reply Comments filed by the Energy Association of Pennsylvania in this docket.

If you have any questions or concerns, please reach out to me at (412) 208-6527 or Rita Black at (412) 208-6530.

Very truly yours,


Meagan Moore

Enclosure

cc via email:

Stephanie A. Wilson, Assistant Counsel, stepwilson@pa.gov

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56	: :	Docket No. L-2025-3058767
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REPLY COMMENTS OF PEOPLES NATURAL GAS COMPANY LLC

Peoples Natural Gas Company LLC (“Peoples” or the “Company”) respectfully files the following Reply Comments to the various comments filed in response to Pennsylvania Public Utility Commission’s (“Commission”) February 29, 2026, Notice of Proposed Rulemaking Order (“NOPR Order”) in the above captioned docket. Peoples also endorses the Reply Comments filed by the Energy Association of Pennsylvania in this docketed matter. The Commission’s NOPR Order seeks to incorporate the provisions of the former Chapter 14, as they existed at their sunset of the Public Utility Code into its Chapter 56 regulations and Peoples supports the Commission’s objective.

I. INTRODUCTION

Peoples filed its letter in lieu of Initial Comments on August 2026 supporting the Commission’s efforts to expeditiously incorporate the provisions of Chapter 14 into the Chapter 56 regulations. Peoples did not have any suggested changes or edits to the regulations in Annex A of the NOPR Order.

Peoples appreciates the opportunity to file Reply Comments to the comments filed by various stakeholders in response to the Commission’s NOPR Order.

Peoples acknowledges the significant effort that has been made by the Commission, utilities, and interested parties, beginning with the original Chapter 14 Order and the reauthorization in 2014. As noted by the Commission in its NOPR Order, Chapter 14 was enacted

when “the General Assembly determined that the Commission’s prior rules had not successfully managed the issue of bill payment that increasing amounts of unpaid bills threatened paying customer with higher rates due to other customers delinquencies. Accordingly, the goal of the former Chapter 14 was to increase timely collections, while ensuring that service is available to all customer based on equitable terms and conditions.” (NOPR Order p. 6) Beginning with the original Chapter 14 Order and the reauthorization in 2014, parties have been working toward the original goals set in the adoption of Chapter 14. The changes made to Chapter 14 to the collection, service application, and payment arrangement rules allowed utilities to improve their efforts to collect money for the service they provide in an effective and responsible manner. It is important to remember that the Company’s goal is not to terminate a customer’s service. The Company has numerous programs in place to assist customers in lieu of termination.

The Company agrees with the various commenters in this docket advocating that the Commission limit this proceeding to the provisions contained in Annex A of the NOPR Order. Peoples submits that many of the commenters have raised important issues in their various comments, but the breadth and scope of many of the comments are significantly outside the scope of the NOPR Order and as a result, should not be addressed or debated in this specific proceeding. The Company submits that many of the suggested changes offered are more appropriately considered in a separate, more comprehensive rulemaking proceeding.

II. REPLY COMMENTS

Peoples affirms its position stated in its August 28, 2026, filing that it has no suggested edits or changes to the proposed regulations in Annex A. Peoples also agrees that the NOPR Order is “not intended as a general review of Chapter 56 regulations.” (NOPR Order p. 12). Peoples’ review of the various initial comments filed in this docket is that the commenters are seeking to

significantly expand the scope of this rulemaking to a general review of the entirety of Chapter 56. Peoples is not responding to each and every proposed modification, but offers Reply Comments on select subjects below. Peoples also reiterates its full support for the Reply Comments filed by the Energy Association of Pennsylvania as they fully respond to the extraneous, out-of-scope issues the other commenters wish to insert into this proceeding.

A. Payment Arrangements

Many commenters seek to expand the rules relating to the length and number of payment arrangements a customer may have and they also seek to limit a customer's monthly payment arrangement amount to 20% of the customer's average bill. Peoples submits that these changes would require significant resources to program its customer billing system and could extend payment terms well beyond a reasonable repayment length. The Company believes that the existing payment arrangement timelines with the existing income categories is appropriate and should be maintained, absent a qualifying change in income or circumstance.

Some commenters specifically wish to expand payment arrangements to CAP customers. The Company cautions that adding a payment arrangement to CAP is likely to increase the monthly energy burden above PUC approved energy burden levels, further burdening low-income households. Low-income households would be better served through other sources, such as hardship funds, LIHEAP and funding available through community resources rather than increasing monthly obligations to an unaffordable level for an extended period of time.

B. Moratorium

Some commenters suggest expansion of termination moratoriums to cover summer months and to have those summer moratoriums apply to gas utilities, extension of the length of termination notices, as well as expansion of medical certifications. As stated above, the Company submits that these suggestions are beyond the scope of this proceeding and are significant changes that are likely to increase costs to utilities and customers.

Moreover, as reported in its 2025 Universal Service Report on Collections, Peoples notes that during winter moratorium, there is a stark increase in non-payment of payment arrangements. The average number of customers in arrears on a payment arrangement monthly in 2025 was 9,630. When moratorium begins December 1, this figure climbs 35% to 12,963 and reaches a high point of 13,544, or 41% higher than average, in January. It is only during the non-moratorium period that delinquencies are reduced to average levels. This indicates that moratorium signals to customers that payment is not necessary. Expanding moratorium will only increase delinquencies to unmanageable levels that will be difficult, if not impossible for customers to overcome.

C. Disconnection Notices

OCA recommends a modification to Chapter 56.91(b), revising it to read ‘no utility should make a practice of delivering more than two consecutive notices of disconnection for past due bills without engaging in the collection identified in the notice’. (page 59). Peoples submits that there are a number of reasons why a utility may need to deliver more than two notices for a specific account. For example, utility workforce restrictions and/or the inability to access some meters (such as inside meters, or meters behind secure gates) – one or both of these examples may mean

that a utility needs more than 2 cycles to disconnect an account. All notices are sent with the intention to disconnect if an account is not resolved as required by regulation today. Failure to send notices will cause confusion and lead customers to think their service is no longer in danger of termination due to nonpayment.

Additionally, regarding disconnection notices, some comments request that utilities be required to send disconnection notices in both English and Spanish. Peoples notes that this should not be mandated as some service territories may not have significant Spanish speaking populations. The requirement, to provide customer information in Spanish as well as English if the utility has a “substantial” number of Spanish-speaking customers is already provided in §56.201(b) pertaining to billing information and is an appropriate standard to apply to termination notices.

D. Medical Certificates

Some commenters wish to expand healthcare providers that can provide medical certificates. Peoples notes that there has been a recent expansion of eligible healthcare providers. Further revising this section of the chapter to include registered nurses and home health care employees is not necessary and would place burden of certification on health staff that are not licensed to make diagnoses.

E. Call Screening, Late Payment Charges, Security Deposits and Reconnection Fees

Some commenters request that the regulations be expanded or enhanced to ensure that utilities are screening callers for income eligibility for program participation multiple times (including at initial start of service and throughout customer life-cycle). Peoples has already adopted this as part of its processes.

Regarding fees for late payments, security deposits and reconnections, some commenters urge the Commission to waive these fees for certain vulnerable customers. Peoples already waives late-payment charges for CAP participants and waives both security deposits and reconnection fees for customers who self-identify as having income below 150% FPL.

III. CONCLUSION

Peoples appreciates the opportunity to offer Reply Comments on the Commission's Notice of Proposed Rulemaking and asks that the Commission consider its comments. Peoples looks forward to continuing to work with the Commission on these issues. Please direct any questions with regard to these comments to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Meagan Moore', is written over a horizontal line.

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Dated: October 13, 2026