



***National Fuel***

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June 8, 2020

**VIA ELECTRONIC FILING**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions  
Request for Utility Information  
Docket No. M-2020-3020055

Dear Secretary Chiavetta:

Enclosed please find National Fuel Gas Distribution Corporation's  
Comments in the above-referenced matter.

Very truly yours,

Nathaniel J. Ehrman, Esq.

Enclosure

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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COVID-19 Customer Service, Billing, and Public Outreach Provisions Request for Utility Information	: : : :	Docket No. M-2020-3020055  Responses of National Fuel Gas Distribution Corporation
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**To the Pennsylvania Public Utility Commission:**

In compliance with the Secretarial Letter issued by the Pennsylvania Public Utility Commission (“Commission” or “PUC”) at Docket No. M-2020-3020055 on May 29, 2020 regarding COVID-19 Customer Service, Billing, and Public Outreach, National Fuel Gas Distribution Corporation (“National Fuel” or the “Company”) submits the following responses.

At the outset, National Fuel wants to note that it truly understands the severity of the current pandemic situation. National Fuel has activated its Pandemic Response Team with the top priority being the safety of our employees, our customers, the public at large, and the environment. In addition to providing the safe and reliable service its customers rely on, National Fuel is here to support its customers during these trying times. National Fuel remains open and willing to work with its customers. It is the Company’s intent to be flexible with its policies going forward and to explore multiple solutions to avoid undue hardship on its customers when possible.

**I. COVID-19 Utility Consumer Service and Billing Policies and Procedures**

**Termination of Utility Service:**

- After the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?
  - How does the utility plan to implement terminations and will it start the process with new termination notices?

**National Fuel Response:** National Fuel shall refrain from conducting any terminations until the moratorium period in the Emergency Order is lifted. Once the moratorium period is over, National Fuel shall evaluate whether to commence sending termination notices out based on then current guidance from the Commission. National Fuel shall follow all applicable requirements related to terminations and would start the process over at that time for any previously pending terminations. While National Fuel may begin collections and terminations at that time, the Company is also committed to working with customers to avoid terminations by utilizing all available resources including entering customers into payment arrangements and helping them identify available funding and forgiveness opportunities.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?
  - Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

**National Fuel Response:**

As of the date of this filing, customers who may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded are as follows:

- All Residential = 17,504, Confirmed Low Income = 6,934
- Non-Residential = 1,222

Customers subject to termination for the same time period in 2019, April 1 through May 31, 2019:

- All Residential = 19,164 (Confirmed Low Income data not available from 2019)
- Non-Residential = 1,348
  - Provide future projections if available.

**National Fuel Response:** Given the current situation, it is very difficult to make any accurate future projections. Prior to the Emergency Order being enacted, the number of National Fuel customers receiving termination notices was down year over year from 2019. COVID-19 has impacted many customers and has impacted some customers’ ability to pay their bills, however,

it is hard to determine how many future terminations there will be depending on how the pandemic and the economy's progress going forward.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

**National Fuel Response:** Yes, National Fuel is currently assessing a reconnection fee to restore service to all customers. However, National Fuel is not requiring payment of the fee before reconnecting service. Rather, the fee is added to the customer’s account upon reconnection and payable with the next invoice issued after reconnection occurs. The reconnection fee also applies to customers that were disconnected prior to the Commission’s Emergency Order and subsequently reconnected.

**Universal Service Programs:**

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**National Fuel Response:** National Fuel has suspended removing customers from its LIRA program for non-payment or failure to recertify.

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

**National Fuel Response:** National Fuel’s hardship fund, Neighbor for Neighbor, normally has a payment requirement of five customer payments within a 12 month period from the date of the application, including one payment in the last 90 days. Due to the current situation, National Fuel has revised these requirements, and is now only requiring that a customer has made three good faith payments within the past 12 months. The good faith payment requirement adds extra flexibility as it does not require full payments. Additionally, removing the requirement regarding

one payment in the last 90 days helps eliminate the burden on customers who may be struggling financially at this time. National Fuel notes that these changes are temporary and will be reevaluated at the next Neighbor for Neighbor board meeting in the fall. National Fuel believes its Neighbor for Neighbor program is effective and broadly constructed to benefit many customers. National Fuel modified the program several years ago to enable more customers to qualify, including veterans and the unemployed, which has benefitted many customers.

**Other Assistance Initiatives:**

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

**National Fuel Response:** As previously stated, National Fuel is committed to supporting its customers during these challenging times. For example, National Fuel is applying late payment charge waivers upon request for customers with difficulty paying their bill. Additionally, National Fuel has provided more flexibility for customers by negotiating additional installment plans with customers who previously exhausted the number of installment plans under PUC regulations. Finally, National Fuel has accepted a lower payment or no payment to turn on or restore service for residential customers. National Fuel believes these initiatives are vital at this time.

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

**National Fuel Response:** National Fuel is currently evaluating different options to provide relief for its customers. As stated, National Fuel plans to work with customers to avoid undue hardship where possible.

## II. Consumer Education and Outreach

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

**National Fuel Response:** Please see the response below.

- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

**National Fuel Response:** National Fuel has made changes to its programs and increased its messaging to customers. Please see below a list of consumer education and outreach materials provided by the Company. Copies of these items are available upon request.

- News Releases
  - 03/16/2020: National Fuel Pennsylvania Customer Assistance Centers to Close Tomorrow
  - 03/24/2020: LIHEAP Available for PA Customers Facing Financial Difficulties
  - 04/01/2020: National Fuel Reminds Pennsylvania Residents to Call Before You Dig
  - 04/07/2020: National Fuel Donates to COVID-19 Relief Efforts
  - 04/30/2020: National Fuel Adjusts Gas Supply Charges in Pennsylvania
  - 05/18/2020: LIHEAP CRISIS Recovery Opens to Help Customers with Heating Bills
- Web
  - COVID-19 customer information link on National Fuel's homepage
  - LIHEAP Crisis Recovery Grant copy added to LIHEAPhelps.com
  - PA Rights and Responsibility available on the National Fuel's Residential Resources page
- Social Media
  - 3/14/20: Suspension of terminations during pandemic
  - 3/4/20: Customer Assistance Centers in Pennsylvania are closing effective March 17 due to the pandemic
  - 3/16/20: Social distancing requirement of 6 feet for customers and employees
  - 3/19/20: CEO message encouraging customers to contact customer service if they are struggling with their bills
  - 3/24/20: Payment assistance programs
  - 3/26/20: Essential employees and customers safety
  - 4/4/20: Essential employees and customers safety
  - 4/15/20: Reminding customers to call 811 before digging and requesting that they limit excavation projects during the pandemic
  - 4/16/20: Asking customers with indoor meters to submit readings
  - 4/28/20: Asking customers with indoor meters to submit readings

- 4/30/20: Reminding customers to call 811 before digging and requesting that they limit excavation projects during the pandemic
- 5/14/20: CEO employee and customer safety message
- 5/20/20: Re-opening communities safety steps
- Advertising
  - LIHEAP Crisis Recovery Grant
    - 6/3/20 - 6/23/20: Pre-roll video online display ads
    - 6/3/20 - 7/5/20: 30-second radio spot
    - 5/28/20 - 8/31/20: 15-second paid social video
- Bill Inserts
  - 3/17/20 - 4/17/20: COVID-19 Information Bill Insert
  - 3/23/20 - 4/8/20: Updated LIHEAP Bill Inserts
- Mailings
  - Termination notice insert indicating suspension of terminations, potential LIHEAP/CRISIS eligibility
  - Customer meter-read document sent to customers with inside meters
  - LIHEAP Crisis Recovery Grant letters sent to potential recipients
- Other
  - LIHEAP Crisis Recovery Grant message added to outside digital board at the Erie, Pa. corporate office
  - LIHEAP CRISIS RECOVERY Grant awareness cards and fliers sent to community partners
  - Customer service hold messaging advises of LIHEAP CRISIS Recovery Grant

In addition to these outreach and education efforts, National Fuel employees, specifically in the consumer response centers, have been trained to provide customers with any needed information. Additionally, customers are still being referred to National Fuel's support programs including, LIRA, LIHEAP, Crisis, Neighbor for Neighbor, and Cares.

- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

**National Fuel Response:** Whenever there are relevant topics that directly impact National Fuel customers, the Company shall notify its customers through mailings, bill inserts, and social media posts.

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service

**National Fuel Response:** Not applicable.

National Fuel is committed to working with its customers to make it through this pandemic. Every day, the Company strives to provide its customers the best possible service while also ensuring the safety of all involved. National Fuel is also dedicated to being flexible and finding solutions to help customers in their time of need. National Fuel has many resources and programs that directly benefit its customers and help families avoid undue hardship in these trying times.

Respectfully submitted,



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