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June 12, 2020

By Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Second Floor North
Harrisburg, PA 17120

In re: COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information; Docket No. M-2020-3020055;
**LEATHERSTOCKING GAS COMPANY, LLC'S RESPONSES TO
DATA REQUESTS OF THE BUREAU OF CONSUMER SERVICES**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission on behalf of Leatherstocking Gas Company, LLC are the responses to BCS Data Requests, Set I, in the above-captioned matter. These responses are being filed and served electronically only pursuant to the COVID-19 Suspension Emergency Order dated March 20, 2020 and ratified March 26, 2020.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder

WES/das
Enclosures

cc: Tom Charles, Office of Communications (thcharles@pa.gov)
Sarah Dewey, Bureau of Consumer Services (sdewey@pa.gov)



330 W. William Street
Corning, NY 14830

June 12, 2020

Secretary Rosemary Chiavetta
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

We are in receipt of your May 29, 2020 correspondence regarding compliance with the state of Pennsylvania's *Emergency Proclamation* and the *Emergency Order*, and its effect on the ways in which the utility can interact with customers. Please find below Leatherstocking Gas Company LLC's (Leatherstocking) responses.

Leatherstocking works closely with our customers by providing education on how and where to access social assistant programs to enable them to keep the heat on as well establishing reasonable payment agreements. As a result of those efforts, Leatherstocking's 60-day arrears remains low. The initial extension of the moratorium had a minimal negative effect on our arrears number and customers inability to pay their gas bills. However, as time continues, the potential for growth of our 60-day arrears increases. This is a conundrum, such that the longer the termination moratorium exists, the amount owed by these customers increases, putting them further into debt. This impacts a small utility by increasing write-offs, negatively impacts cash flow, and results in COVID-19 related losses potentially leading to rate increase requests. Such termination moratorium increases will spread to all customer classes, potentially disproportionately impacting those consumers who are just above the poverty thresholds.

Currently, the moratorium established in the Chairman's Emergency Order is tied to the Governor's Emergency Declaration. If the Governor's Emergency Declaration and the moratorium extend into September, that would leave just under three months before the winter termination moratorium period commences on December 1, 2020 for customers and the utility to reduce/eliminate the 60-day arrears increase.

Leatherstocking notes that the Governor has rescinded his stay-at-home order. Leatherstocking strongly urges the Commission to evaluate the impacts of a September extension of the moratorium to both the customer and the utility and reduce the time-frame of the moratorium, so the customers

and the utilities are able to reduce their exposure and lessen the chances of the moratorium contributing to rate increases to recover the losses.

Leatherstocking Responses to Data Requests

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

Commission Question: Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

Leatherstocking response: Leatherstocking made efforts to assure customers that it will not shut-off service during the pandemic. Customers have also been provided available information for avenues of assistance (i.e. LIHEAP and other resources). This does not differ from Leatherstocking's pre-COVID-19 policy to work closely with our customers to ensure they have the most up-to-date information on available resources.

Termination of Utility Service:

- Commission Question: 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?

Leatherstocking Response: The Company will commence the termination process with a set of 10-Day Notices that will be mailed thirty (30) days after the moratorium has expired, and then, subsequent 3-Day Notices will be posted on the customer's door. The Company will continue to exercise flexibility when assisting customers with the available assistance programs and payment arrangement timelines based on individual customer's abilities.

- Commission Question: 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. Provide future projections if available.

Leatherstocking Response: Currently, if the moratorium were not in effect, there would be one commercial and seven residential customers subject to termination procedures. This represents 1.9% of Leatherstocking's customer base. This number is comparable with 2019. Due to Leatherstocking's proactive customer service efforts, many customers were educated on the benefits of budget billing in managing their accounts. They were also made aware that if they were having trouble paying their bill, then they may call and work out a manageable plan with customer service.

Leatherstocking has no confirmed low income, Lifeline, or CAP customers.

- Commission Question: 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?

Leatherstocking Response: Leatherstocking does not assess a reconnection fee.

Universal Service Programs:

- Commission Question: Is the utility currently removing customers from CAP 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?

Leatherstocking Response: As mentioned previously, Leatherstocking does not have confirmed low income or CAP customers. We do have several organizations in the area that we direct our customers that provide assistance and financial education to those in need.

Other Assistance Initiatives:

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

Leatherstocking Response: Prior to and during the pandemic, we worked closely with our customers to help them with their utility bills. That philosophy has not changed.

- 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.

Leatherstocking Response: We do not propose any changes to our policy.

II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts:

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

- 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.

Leatherstocking Response: Leatherstocking provides the Customer Rights and Responsibilities to its customers annually by mail. We have spoken with all hardship customers to inform them of important PA PUC proceedings/orders and to discuss available programs and educational services. Leatherstocking is not required to have a formal customer assistance program because it has annual revenues less than \$6,000,000. 66 Pa. C.S. 1403 (definition of natural gas public utility and public utility). However, Leatherstocking does provide budget billing and information regarding available programs and educational services that can help low income customers.

If you have any questions in this matter, please contact me.

Sincerely,

Matt J. Cook

Matt J. Cook
VP Operations/Customer Service
Leatherstocking Gas Company
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cell: 607-542-0034

cc: Vickie Calby, Charlene Faulk, File

VERIFICATION

I, Mathew J. Cook, Vice President of Operations and Customer Service for Leatherstocking Gas Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Mathew J. Cook
Vice President of Operations and Customer Service
Leatherstocking Gas Company

DATED: 6/11/20