



VIA E-FILING AND ELECTRONIC MAIL

August 18, 2020

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

Re: Docket Number M-2020-3019244 – Emergency Order Re: Establishing Public Utility Service Termination Moratorium

Dear Secretary Chiavetta:

Peoples Natural Gas Company LLC and Peoples Gas Company LLC (collectively “Peoples” or the “Company”) respectfully files the following written comments in response to Chairman Dutrieuille August 10th letter seeking comments from interested parties regarding the ongoing termination moratorium and customer protections for at-risk customers in the event the termination moratorium is lifted

Please contact Rita Black (412-208-6530) or the undersigned should you have any questions or require further information regarding this filing.

Very truly yours,

Jennifer L. Petrisek
Senior Counsel

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order Re: Establishing Public
Utility Service Termination Moratorium

Docket No. M-2020-3019244

COMMENTS

Peoples Natural Gas Company LLC and Peoples Gas Company LLC (“Peoples” or the “Company”) respectfully submits the following written comments in response to the August 10th letter issued by Chairman Dutrieuille in the Pennsylvania Public Utility Commission (“Commission”) in the above-noted docket regarding Public Utility Service Termination Moratorium Proclamation of Disaster Emergency – COVID 19. In the August 10th letter, Chairman Dutrieuille recognizes that while the COVID-19 pandemic and associated impacts of the health crisis have not disappeared, maintaining the termination moratorium, in its current states, is unsustainable due to the impacts on utility customers and the utility industry. The Chairman also recognizes the importance of providing available assistance to impacted customers, especially those who are eligible for income-based programs. As the Chairman intends to address the termination moratorium at the Commission’s August 27th meeting, she has requested comments from interested parties regarding the ongoing termination moratorium and customer protections for at-risk customers in the event the termination moratorium is lifted.

On June 8, 2020, the Peoples submitted comments in response to the Commission’s Request for Utility Information in the Docket M-2020-3020055 (COVID-19 Customer Service, Billing and Public Outreach Provisions - Request for Utility Information). The Company’s Comments outlined the steps taken by Peoples to assist customers negatively impacted by the COVID-19 pandemic as well as outreach efforts undertaken by Peoples to advise customers of external and internal programs and options available to assist customers facing financial impacts due to the COVID-19 pandemic. These actions continue to be of vital importance to Peoples and Peoples appreciates, and shares, the Chairman’s concerns that while the impacts of the COVID-19 health crisis have not disappeared, the ongoing impacts to customers and utilities must be evaluated to find a way forward to resume normal termination activity, especially with the winter

moratorium period quickly approaching. A summary of the on-going actions taken by Peoples follows.

During the COVID-19 pandemic, Peoples has continued to support our customers on a case-by-case basis, providing additional assistance outside of our normal procedures, such as:

- o Waiving Late Payment Charges on a case-by-case basis
- o Waiving Security Deposits on a case-by-case basis
- o Accepting a lesser amount to reconnect service to quickly get customers back in service
- o Educating and encouraging Budget Billing to equally spread out yearly utility costs
- o Offering additional Payment Arrangements, even if they otherwise might not be eligible
- o Offering Payment Date Extensions on a case-by-case basis
- o Enrolling customers into our Customer Assistance Program (CAP) with verbal income verification when written documentation is unavailable or inaccessible.
- o Enrolling customers into our Customer Assistance Program (CAP) using the PUC's zero income form when customers are without income while awaiting unemployment benefits
- o Pausing removals from our Customer Assistance Program (CAP) due to failure to recertify income information
- o Waiving "Good Faith Payment" requirements for Hardship Programs
- o Making outbound calls to potentially eligible Customer Assistance Program (CAP) customers to educate and enroll customers.

Peoples believes that a case-by-case analysis of a customer's situation is critical to provide the best assistance to customers facing negative financial impacts from the COVID-19 pandemic. In order to encourage customers to reach out to the Company to facilitate the account review, Peoples has been sending payment reminders to customers who have fallen behind on their payments and/or would normally have been subject to termination. These letters are designed to provide the customer information about their account and to encourage them to contact the

Company to discuss payment arrangements and available assistance programs. The letters contain the following:

- Amount past due
- Ways to contact Peoples to discuss payments options or plans
- Budget Billing Options
- Ways to pay the bill by visiting the website
- Available Assistance Programs

Additionally, Peoples has provided emails to all customers, as well as provided information in bill inserts and on its website, news media and social media sites, to educate customers on Peoples' COVID-19 response and assistance that may be available to customers. Peoples issued a colorful stand-alone insert regarding LIHEAP in its July bills to inform all customers of assistance that is available. Peoples continues to update the information on the website and social media sites and to encourage customers to use its online ProgramFinder questionnaire to pre-qualify for available assistance and begin the application process.

In order to move forward, Peoples agrees with Chairman Dutrieuille that the total prohibition on termination of utility service must be reviewed. Despite the ongoing communications to customers regarding the importance of addressing utility bills during the termination moratorium, certain customers have not contacted the Company for assistance and/or brought their bills to a current status. Peoples believes that setting a date certain for an end of the termination moratorium is necessary to ensure the balancing of customer protection with the financial impacts to the utilities, which may ultimately have an impact on all customers, through uncollectible costs and increased rates.

Communication of the end date for the termination moratorium to customers through various channels, such as social media updates, payment reminders and termination notices should begin as soon as possible to ensure customers are provided with an opportunity to reach out to their utilities, if they have not already done so, to make payment arrangements and determine if programs may be available. Peoples is committed to using various communication channels to

notify customers of the need to reach out to their utilities, as soon as is practicable, prior to the expiration of the termination moratorium.

Peoples requests that the Commission provide utilities with a date certain when the termination moratorium will be lifted, as well as a date certain by which utilities may begin to send termination notices to all classes of customers (i.e. residential, commercial, industrial). Peoples will then initiate the process to generate new termination notices to affected customers, which notices will be mailed by applicable billing cycle. Providing a date certain, as requested, will allow Peoples to ensure that its customer service center, and CAP administrator, Dollar Energy Fund, are prepared for potentially higher call volumes to assist customers as described earlier in these comments. As Peoples supports the Commission's goal of ensuring there are appropriate customer protections in place when the termination moratorium is lifted, Peoples is committed to continuing to address accounts, on a case-by-case basis, as described earlier in these Comments, to assist customers in locating available options and programs. In addition, the Commission's existing regulations for residential and commercial customers provide adequate protections, such as setting payment arrangements, addressing disputes, and requiring that all collection notices include information alerting the customer that assistance is available and that the customer has the option of contacting the Commission to file a dispute, if they are not satisfied with the utilities response.

Peoples is committed to helping our customers and our community through this event and appreciates the opportunity to provide comments on this important issue.

Respectfully submitted this 18th day of August.



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