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August 18, 2020

VIA E-File

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17210-3265

**Re: Emergency Order Establishing Public Service Termination
Moratorium
Docket No. M-2020-3019244**


Dear Secretary Chiavetta:

Enclosed for filing please find Columbia Gas of Pennsylvania, Inc.'s Response to Chairman Dutrieuille's Letter dated August 10, 2020.

If you have questions, please call me at 717-210-9625 or e-mail me at ahirakis@nisource.com.

Thank you for your attention to this matter.

Very truly yours,


Amy E. Hirakis

Enclosures

cc: Rosemary Chiavetta, Secretary (rchiavetta@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Emergency Order Establishing Public Service Termination Moratorium :
: Docket No. M-2020-3019244

**Columbia Gas of Pennsylvania, Inc.’s Response to
Chairman Dutrieuille’s Letter Dated August 10, 2020**

On August 10, 2020, the Chairman of the Pennsylvania Public Utility Commission (“Commission”), Gladys Brown Dutrieuille, issued a letter advising that it is her intent to address the termination moratorium¹ at the Commission’s August 27, 2020, Public Meeting. The letter states that it is time to reconsider the termination moratorium, and acknowledges the possibility that maintaining the termination moratorium could result in the acceleration of arrearages accruing for many utility customers, which places these customers at an increased risk of default and termination in the future. The letter also recognizes that an absolute termination moratorium may hinder the efforts of utility companies to enroll customers into customer assistance programs and payment agreements. Finally, the letter noted that the Chairman believes that customer protections will be required for the termination moratorium to be lifted, and sought comments from interested parties regarding the termination moratorium and customer protections for at-risk customers.

¹ On March 13, 2020, the Commission issued an Emergency Order that prohibited the termination of public utility service for the duration of Governor Wolf’s Proclamation of Disaster Emergency (“Proclamation”), or until otherwise established by the Commission.

Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) appreciates the opportunity to provide its perspective regarding the termination moratorium and the customer protections that are in place for at-risk customers. At the onset of the COVID-19 pandemic, Columbia voluntarily halted service terminations prior to the Commission’s March 13, 2020 Emergency Order and implemented a number of voluntary customer protections that provide additional protections beyond those contained within the Public Utility Code and the Commission’s regulations. However, as the COVID-19 pandemic continues, and with it, the termination moratorium, the Company is experiencing a decline in customer call volume, a decline in payment arrangements, and a decline in customer assistance program participation despite extensive outreach to at-risk customers. It is the Company’s position that the decline is due in substantial part to the continuation of the termination moratorium, and agrees with the Chairman that it is now time reconsider the termination moratorium.

Columbia recognizes the ongoing impact of COVID-19 on customers’ finances, health and general wellbeing, and it is not the Company’s desire to potentially aggravate any customer’s situation by terminating their natural gas service; thus, the Company remains committed to working with all of its customers through this difficult time. Indeed, Columbia has made substantial efforts over the past several months to develop policies that could assist customers during the COVID-19 pandemic. These policies continue today, and it is Columbia’s intent to continue these policies until they are no longer needed. It is Columbia’s position that its current policies provide sufficient customer protections, and additional customer protections do not need to be adopted by the Commission if/when the Commission lifts the termination moratorium. Below, the Company provides a summary of the policies and customer protections that have been

established during the COVID-19 pandemic, and respectfully requests that the Chairman and Commission consider these, and those implemented by other public utility companies, as it considers its actions related to the termination moratorium.

Columbia's Current Communications and Outreach Efforts

Columbia has made significant efforts to communicate with customers who are accruing arrearages about the availability of utility assistance programs, as well as the LIHEAP recovery CRISIS program, which is scheduled to close at the end of August. Specifically, the Company has engaged in the following:

- Social media ads and posts on Facebook & Twitter;
- Targeted outbound calls for LIHEAP recovery CRISIS program;
- E-mails to customers that may be eligible for the LIHEAP recovery CRISIS program;
- E-mails to customers regarding current collection practices;
- Updated information on its website regarding available programs;
- Announcement on its website that the Company has suspended all terminations for non- payment;
- Bill Inserts;
- A letter sent to customers in arrears explaining available resources; and
- Updates in a Customer Newsletter

Columbia's Current Practices and Protections for At Risk Customers

Columbia has adapted its policies and procedures, as well as implemented additional initiatives, in an attempt to assist all customers affected by the COVID-19 pandemic. The following is a list of these protections and policies:

- Suspended all late payment fees;
- Relaxed reconnection guidelines on restoration quotes to assist customers needing hot water and heat during the pandemic;
- Initiated Senior Wellness check phone calls to customers over 70 years old whose records indicate live alone;
- Relaxed Hardship Fund and CAP guidelines to reduce barriers to enrollment;
- Ceased all Company removals from the CAP program including non- payment, failure to re-verify income and failure to cooperate with weatherization;
- Increased communication about operations, payment assistance and programs including the LIHEAP recovery CRISIS program;

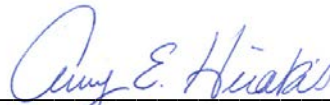
- Offered additional payment plan options for those customers seeking a non-budget plus payment plan

Further, in the event that the termination moratorium is lifted, Columbia would take a deliberate approach to resuming terminations. Columbia recognizes the continued hardships faced by our customers that have been affected by the pandemic. However, the Company also recognizes the call to action a termination notice provides to encourage eligible customers to make contact with the utility and follow through with getting assistance. Thus, the Company can commit to provide the following protections for the duration of the year:

- Reminder letter to customers in lieu of a termination notice during the month of September.
- A maximum security deposit amount of \$150.00 for restoration of service.
- Relaxed Hardship Fund eligibility guidelines to reduce barriers to enrollment including no minimum payment required, allow active CAP customers access, and open enrollment to all customers that have arrears.
- Continue to not remove customers from the CAP program including non-payment, failure to re-verify income and failure to cooperate with weatherization.
- Increased communication about payment assistance and programs.
- Once the Company begins termination, follow existing regulations including providing a valid ten day notice and subsequent notices prior to termination, as well as prioritize customers with high balances.

In conclusion, Columbia agrees with the Chairman that it is time to reconsider the termination moratorium. Further, the Company respectfully requests that the Commission consider the customer protections that each public utility company has voluntarily initiated (and intends to continue) in response to the COVID-19 pandemic as it determines what further customer protections are needed to lift the termination moratorium.

Respectfully submitted,



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