

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

REBUTTAL TESTIMONY OF

DENISE ADAMUCCI

ON BEHALF OF
PHILADELPHIA GAS WORKS

Docket No. R-2020-3017206

Philadelphia Gas Works

General Rate Increase Request

TOPICS:

Quality of Service to Low-Income Customers
Universal Service and Energy Conservation Issues
Residential Customer Charge
Management Quality, Efficiency and Effectiveness

July 13, 2020

Table of Contents

- I. INTRODUCTION 1
- II. RESPONSES TO DIRECT TESTIMONY OF HARRY GELLER2
 - A. Characteristics of and Quality of Service to Low-Income Customers 3
 - B. Universal Service and Energy Conservation Issues..... 9
 - 1. PGW’s Recent Universal Service and Energy Conservation Plan (“USECP”) Proceedings 9
 - 2. CRP Enrollment and Income Verification Procedures 14
 - 3. CRP Average Bill 16
 - 4. LIURP Landlord Outreach..... 21
 - C. Other Low-Income Customer Service Issues 23
 - 1. LIHEAP Crisis Grant Acceptance Policy 23
 - 2. PGW’s Compliance with the Discontinuance of Service to Leased Premises Act (“DSLPA”)..... 26
 - 3. Protections for Victims of Domestic Violence 28
 - 4. Reconnection Policies 29
- III. RESPONSES TO DIRECT TESTIMONY OF ROGER COLTON..... 30
 - A. Residential Customer Charge 31
 - B. Management Quality, Efficiency and Effectiveness, Customer Service, and Universal Service Practices..... 36
- IV. CONCLUSION..... 43

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION WITH PGW.**

3 A. My name is Denise Adamucci and I am the Vice President of Regulatory Compliance and
4 Customer Programs at Philadelphia Gas Works (“PGW” or “Company”).

5 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK
6 HISTORY.**

7 A. I have an MA in English Literature from Arizona State University and a JD from Boston
8 University School of Law. Prior to my current position, I worked as an attorney for
9 approximately 14 years. I worked in private practice at Manta and Welge, and then at
10 Klett Rooney Lieber & Schorling (acquired by Buchanan Ingersoll & Rooney).
11 Subsequently, I worked in PGW’s legal department as a senior attorney.

12 **Q. HAVE YOU EVER PROVIDED TESTIMONY BEFORE THIS COMMISSION?**

13 A. Yes. I testified before the Pennsylvania Public Utility Commission (“PUC” or
14 “Commission”) in PGW’s most recent base rate proceeding at Docket No. R-2017-
15 2586783.

16 **Q. DID YOU SUBMIT DIRECT TESTIMONY IN THIS MATTER?**

17 A. No.

18 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

19 A. The purpose of my testimony is to respond to various issues raised by Roger Colton on
20 behalf of the Office of Consumer Advocate (“OCA”) and Harry Geller on behalf of the
21 Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater
22 Philadelphia (collectively, “TURN”).

23 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.**

1 A. First, I respond to a variety of issues raised by TURN witness Harry Geller regarding
2 PGW's Customer Responsibility Program and other programs and policies affecting low-
3 income customers, including: (1) characteristics of low-income customers and PGW's
4 quality of service to these customers; (2) CRP enrollment and income verification
5 procedures; (3) CRP Average Bill; (4) LIURP outreach to landlords; (5) LIHEAP Crisis
6 Grant Acceptance Policy; (6) compliance with the Discontinuance of Service to Leased
7 Premises Act; (7) protections for victims of domestic violence; and (8) reconnection
8 policies. Second, I respond to issues raised by OCA witness Colton, including: (1)
9 PGW's proposed residential customer charge, to the extent it touches on low-income
10 programming; and (2) PGW's management quality, efficiency and effectiveness,
11 customer service, and universal service practices.

12 **Q. WILL OTHER WITNESSES BE ADDRESSING THESE ISSUES?**

13 A. Yes. PGW witnesses H. Gil Peach, Bernard Cummings and Kenneth Dybalski address
14 related issues.

15 **II. RESPONSES TO DIRECT TESTIMONY OF HARRY GELLER**

16 **Q. DID YOU REVIEW THE DIRECT TESTIMONY OF TURN WITNESS HARRY**
17 **GELLER?**

18 A. Yes, I did.

19 **Q. PLEASE SUMMARIZE THE AREAS OF MR. GELLER'S TESTIMONY TO**
20 **WHICH YOU WISH TO RESPOND.**

21 A. I will respond to Mr. Geller on a variety of issues raised in his testimony regarding
22 PGW's CRP and other programs and policies affecting low-income customers, including:
23 (1) characteristics of low-income customers and PGW's quality of service to these
24 customers; (2) CRP enrollment and income verification procedures; (3) CRP Average

1 Bill; (4) LIURP outreach to landlords; (5) LIHEAP Crisis Grant Acceptance Policy; (6)
2 compliance with the Discontinuance of Service to Leased Premises Act; (7) protections
3 for victims of domestic violence; and (8) reconnection policies.

4 **A. Characteristics of and Quality of Service to Low-Income Customers**

5 **Q. DOES MR. GELLER PROVIDE TESTIMONY ON CHARACTERISTICS OF**
6 **LOW-INCOME CUSTOMERS IN PGW'S SERVICE TERRITORY?**

7 A. Yes. Mr. Geller testified that low-income customers will be disproportionately
8 negatively impacted by the proposed rate increase. TURN St. No. 1 at 8-9. He also
9 testified that many customers have unaffordable energy bills and high energy burdens.
10 TURN St. No. 1 at 15-20.

11 **Q. HOW DO YOU RESPOND TO THESE CONCERNS?**

12 A. PGW recognizes the impact of rate increases on all customers, including low-income
13 customers. However, PGW has taken significant steps to assist low-income customers in
14 affording their bills. PGW has a strong customer assistance program (called the
15 Customer Responsibility Program, or CRP) in place to assist customers in need with a
16 subsidized bill and arrearage forgiveness. The structure and offerings of CRP are
17 explained further below and in my rebuttal to the testimony of Mr. Colton. Additionally,
18 as will be further discussed below, PGW recently voluntarily petitioned the Commission
19 to implement new, lower CRP energy burdens to further assist low-income customers.
20 Under this new pilot program ("CRP Pilot"), CRP participants will pay the **lower of**
21 either (i) 4% or 6% of their income, or (ii) their average bill; as an additional financial
22 benefit, CRP participants will no longer be obligated to pay a \$5 co-pay toward pre-
23 program arrears.

1 Currently, CRP participants with household income at 0-50% of the Federal
 2 Poverty Level (FPL) pay 8% of income – this is changing to 4%; participants with
 3 household income at 51-100% FPL pay 9% of income – this is changing to 6%; and
 4 customers with household income at 101-150% FLP pay 10% of income – this is
 5 changing to 6% of income. Since there will not be a \$5 co-pay, CRP customers will be
 6 required to pay nothing above those energy burden percentages. The PUC approved
 7 PGW’s proposed lower energy burdens. It is PGW’s understanding that it was the first
 8 Pennsylvania utility to voluntarily propose to provide such lower energy burdens. In fact,
 9 TURN supported this voluntary proposal.¹

10 **Q. PLEASE SUMMARIZE THE CONCERNS MR. GELLER RAISED REGARDING**
 11 **PGW’S CUSTOMER SERVICE FOR LOW-INCOME CUSTOMERS.**

12 A. Although he at least commends PGW for its CRP Pilot, for revisions to its “Crisis
 13 acceptance policy” and for its new online CRP application process,² Mr. Geller argues
 14 that PGW still has not done enough to insulate low-income customers from the negative
 15 effects of the proposed rate increase, and that therefore PGW’s quality of service to low-
 16 income customers is inadequate. TURN St. No. 1 at 10-11. He also testified that PGW
 17 has not adequately assessed whether its “policies” impede some low-income customers
 18 from accessing and maintaining service. TURN St. No. 1 at 11-15.

19 **Q. HOW DO YOU RESPOND?**

20 A. I disagree with Mr. Geller’s position that PGW is not providing adequate service to low-
 21 income customers. PGW has a generous customer assistance program in place that helps

¹ See Low Income Advocates’ Letter in Lieu of an Answer, Mar. 2, 2020, at Docket No. M-2019-3012599, available at <http://www.puc.state.pa.us/pcdocs/1656432.pdf>.

² See TURN St. No. 1 at 25, 43.

1 many low-income customers to afford and maintain service, and PGW is committed to,
2 and continues to, improve upon CRP. CRP has no cap on the number of participants who
3 may join the program. Further, PGW is in the process of implementing the CRP Pilot – a
4 significant change to the program that will provide substantial financial value to low-
5 income participants. PGW also engages in significant annual outreach to educate its
6 customers on available resources.

7 Additionally, as reported by the PUC in its most recent Universal Service
8 Programs and Collections Performance Report (Universal Service Report), PGW’s Low
9 Income Usage Reduction Program (LIURP) is the highest funded natural gas program in
10 the Commonwealth at \$7.998 million in 2019 (the nearest projected spend is Columbia
11 Gas at \$5.3 million, followed by PECO Gas at \$2.25 million);³ and PGW’s LIURP is the
12 second highest funded LIURP of all electric and natural gas distribution companies in the
13 Commonwealth, surpassed only by PPL Electric Utilities.⁴

14 As will be discussed below, Mr. Geller wants PGW to greatly expand the scope of
15 its assistance programs without regard to the cost of those changes, or the real value of
16 the changes. PGW must balance the benefit of these programs with the associated costs,
17 which are borne by other ratepayers. I believe that PGW’s current assistance programs
18 provide significant benefits to low-income customers while appropriately balancing the
19 benefits with the cost to other ratepayers.

³ Pa. Public Utility Commission’s Report on 2018 Universal Service Programs & Collections Performance (Dec. 2019) (“Universal Service Report”), at 47, *available at* http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf.

⁴ *Id.*

1 **Q. WHAT DOES MR. GELLER CONCLUDE WITH REGARD TO THE**
2 **PROPOSED RATE INCREASE AND THE LEVEL OF SERVICE TO LOW-**
3 **INCOME CUSTOMERS?**

4 A. Mr. Geller concludes that any assessment of whether the proposed rate increase is just
5 and reasonable must consider the financial harm to low-income customers. He concludes
6 that no rate increase can be approved unless PGW is required to improve its policies and
7 programs to assist low-income customers, apparently regardless of the costs, and that
8 PGW must take further action to mitigate the impact of a rate increase on low-income
9 customers. TURN St. No. 1 at 20-22, 72-73.

10 **Q. HOW DO YOU RESPOND?**

11 A. PGW's low-income policies and programs have been reviewed and approved by the PUC
12 in its Universal Service and Energy Conservation Plan (USECP) filings, in which TURN
13 participates. The PUC's determination of whether a utility is providing appropriate
14 universal services is not a simple determination based on a few isolated issues – some of
15 this complexity is evidenced by the Commission's recent investigation into CAP energy
16 burdens.⁵ In PGW's USECP filings, the PUC considers PGW's provision of universal
17 services as a whole, and recently approved PGW's provision of universal service earlier
18 this year (2020).⁶ At cost to other firm ratepayers, PGW's robust low-income policies
19 and programs provide significant value and financial protection to low-income
20 customers. Thus, I do not agree with Mr. Geller's opinion.

⁵ See *Final Policy Statement and Order*, Docket No. M-2019-3012599 (order and annex entered on Nov. 5, 2019) (subsequently clarified on Feb. 6, 2020, pursuant to a Petition for Reconsideration/Clarification).

⁶ *Philadelphia Gas Works Universal Service an Energy Conservation Plan for 2017-2022*, Docket No. M-2016-2542415, and *Petition to Amend Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. P-2020-3018867, Order (entered Mar. 26, 2020).

1 In fact, Mr. Geller includes criticism of energy burdens in Philadelphia without a
 2 full discussion of the CRP Pilot.⁷ Mr. Geller merely acknowledges the CRP Pilot⁸ and
 3 appears to reject PUC-approved energy burden policies.⁹ He states that he will not
 4 address this since it is not “tied” to the rate increase,¹⁰ although he does at least
 5 acknowledge that “[t]o the extent low-income PGW customers are able to access and
 6 maintain enrollment in the CRP Percentage of Income program, they will be insulated
 7 from the rate increase.” TURN St. No. 1 at 22.

8 **Q. DOES MR. GELLER OPPOSE THE PROPOSED INCREASE TO PGW’S**
 9 **CUSTOMER CHARGE?**

10 A. Yes, Mr. Geller opposes the proposed increase to the customer charge. He testified that a
 11 higher customer charge will cause significant harm to low-income, low-use customers.
 12 TURN St. No. 1 at 9-10.

13 **Q. HOW DO YOU RESPOND TO MR. GELLER’S CONCERNS?**

14 A. Both Mr. Geller and Mr. Colton have produced no credible evidence that PGW or
 15 Philadelphia low-income customers are low-use. Mr. Peach provides a more detailed
 16 discussion of this argument in his rebuttal testimony. Further, CRP provides a fixed
 17 monthly bill based on a PUC determined affordable energy burden.

18 **Q. DID PGW TAKE ADDITIONAL STEPS TO SPECIFICALLY ADDRESS THE**
 19 **POTENTIAL ECONOMIC IMPACT OF THE COVID-19 PANDEMIC ON ITS**
 20 **CUSTOMERS?**

⁷ See TURN St. No. 1 at 16.

⁸ TURN St. No. 1 at 21, fn. 15.

⁹ TURN St. No. 1 at fn. 15.

¹⁰ TURN St. No. 1 at 21-22.

1 A. Yes. The COVID-19 pandemic has created a very challenging and quickly evolving
2 situation in recent months that has significantly affected Philadelphians. PGW recognized
3 the effect the pandemic could have/is having on a number of its customers¹¹ and took
4 steps to provide assistance. Prior to the pandemic, PGW already had a robust CRP in
5 place, and, as noted above, recently voluntarily petitioned the Commission to implement
6 the CRP Pilot – which should assist those financially impacted by the pandemic in
7 maintaining their service. In response to the pandemic, PGW took the following steps to
8 further assist customers who might be struggling:

- 9 • Customers are not being charged late payment fees at this time.
- 10
- 11 • Customers are currently not being removed from CRP for non-payment or for
12 failure to recertify.
- 13
- 14 • PGW is currently not requiring acceptance of LIURP weatherization as a
15 condition of CRP participation.
- 16
- 17 • PGW is currently performing extensive Crisis outreach to assist customers in
18 obtaining a Crisis grant and has engaged in an ongoing partnership with the
19 DHS County Assistance Office regarding the Crisis program.
- 20
- 21 • The requirement for CRP documentation has been adjusted for customers
22 unable to obtain unemployment documentation due to the pandemic at this
23 time.
- 24
- 25 • PGW is currently allowing the submission of emailed documentation for new
26 service applications.
- 27
- 28 • PGW has expanded eligibility for Hardship Funds to allow enrollment without
29 having a termination notice, as would previously have been required, at this
30 time.
- 31
- 32 • Of course, customers are not being terminated for non-payment while the
33 Commission’s Emergency Order at Docket No. M-2020-3019244 is in place.
34

¹¹ See Mr. Peach’s rebuttal testimony (PGW St. No. 11-R) for further discussion.

- Terminations have also currently been suspended where the user has not established a contract with PGW or has not allowed meter access.

B. Universal Service and Energy Conservation Issues

1. PGW’s Recent Universal Service and Energy Conservation Plan (“USECP”) Proceedings

Q. WHAT ARE THE PURPOSES OF PGW’S UNIVERSAL SERVICE AND ENERGY CONSERVATION (COLLECTIVELY, “UNIVERSAL SERVICE”) PROGRAMS?

A. Consistent with the Commission’s regulations at 52 Pa. Code § 62.3, the purposes of PGW’s Universal Service programs are to: (1) help low-income customers maintain affordable natural gas service; (2) make available payment assistance to low-income customers; (3) help low-income customers conserve energy and reduce residential utility bills; and (4) ensure the Universal Service programs are operated in a cost-effective and efficient manner.

Q. DOES THE COMMISSION REVIEW AND APPROVE PGW’S UNIVERSAL SERVICE PROGRAMS?

A. Yes. In accordance with Commission regulation at 52 Pa. Code § 62.4, every three years utilities are required to file a Universal Service and Energy Conservation Plan for Commission review and approval. The Bureau of Consumer Services (“BCS”) is the Bureau vested with Commission oversight of universal service programs and plans.¹²

Q. PLEASE DESCRIBE THE MAJOR COMPONENTS OF PGW’S USECP.

A. PGW’s USECP includes PGW’s CRP, which is intended to help low-income residential customers meet their energy needs by offering payment assistance in the form of an affordable bill. The CRP structure, eligibility requirements and program costs are all

¹² See Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2016-2542415, Order (entered Aug. 3, 2017), at 2.

1 approved as part of the USECP. Another component of PGW's USECP is its Low
2 Income Usage Reduction Program ("LIURP"), called Home Comfort, the purpose of
3 which is to provide free, in-home weatherization and energy conservation education
4 services for single-family, high use low-income customers, and – on a pilot basis –
5 similar services to multi-family properties pursuant to the pilot Low-Income Multi-family
6 Efficiency ("LIME") program. Other components of PGW's USECP include: (1) the
7 Customer Assistance Referral and Evaluation Service ("CARES") Program; and (2)
8 matching grants provided by PGW and the Utility Emergency Service Fund ("UESF")
9 referred to as "Hardship Funds."

10 **Q. DID PGW RECENTLY MODIFY ITS USECP?**

11 A. Yes. In October 2019, the Commission issued an Order establishing a new USECP
12 Filing Schedule and extended the duration of PGW's existing USECP through 2022.¹³
13 At that time, PGW was directed to provide updated enrollment and budgetary projections
14 for the extended terms of its existing USECP based on the new filing schedule. The
15 Commission also amended its Policy Statement on Customer Assistance Programs ("CAP
16 Policy Statement")¹⁴ in November 2019 and urged natural gas distribution companies and
17 electric distribution companies to incorporate the CAP policy amendments into their
18 USECPs.

19 In consideration of these Orders, PGW determined it would file an addendum to
20 its USECP with the CRP Pilot Program offering lower CRP energy burdens, and later

¹³ See *Universal Service and Energy Conservation Plan Filing Schedule*, Docket No. M-2019-3012601, Order (entered Oct. 3, 2019), available at <http://www.puc.pa.gov/pcdocs/1638860.docx>.

¹⁴ See *Final Policy Statement and Order*, Docket No. M-2019-3012599 (order and annex entered on November 5, 2019) (subsequently clarified on February 6, 2020, pursuant to a Petition for Reconsideration/Clarification).

1 requested expedited review of the filing.¹⁵ By Order issued March 26, 2020, the
 2 Commission approved the changes specified in PGW's filing and approved PGW's
 3 implementation of certain changes to its CRP.¹⁶ PGW incorporated these changes into its
 4 Amended USECP for 2017-2022.¹⁷

5 **Q. PLEASE DESCRIBE CHANGES TO PGW'S USECP MADE AS PART OF ITS**
 6 **2017-2022 AMENDED USECP.**

7 A. As part of the Amended USECP, PGW is implementing the CRP Pilot through the term
 8 of its Amended USECP. This program is expected to be effective in the fall of 2020.
 9 PGW also modified the consumption limit (which was previously implemented as a
 10 pilot), and, as required by Commission Order, added a Consumer Education and
 11 Outreach Plan as an appendix to the USECP.¹⁸ The Office of Consumer Advocate and
 12 Office of Small Business Advocate have appealed the PUC's approval of the CRP Pilot
 13 but it will be implemented this fall of 2020 given that there has not been a stay imposed
 14 by the PUC.

15 **Q. WHAT ISSUES AND PROPOSALS HAVE THE PARTIES RAISED**
 16 **REGARDING PGW'S USECP?**

17 A. Regarding CRP, Mr. Geller recommends changes to various PGW CRP "policies,"
 18 including enrollment processes, income verification requirements, CRP Average Bill

¹⁵ *2020 Addendum to PGW's Existing 2017 USECP and Petition to Expedite Review* (Docket Nos. M-2016-2542415 & P-2020-3018867).

¹⁶ *Philadelphia Gas Works Universal Service an Energy Conservation Plan for 2017-2022*, Docket No. M-2016-2542415, and *Petition to Amend Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. P-2020-3018867, Order (entered Mar. 26, 2020).

¹⁷ PGW's Second Amended Universal Service and Energy Conservation Plan 2017-2022, (Apr. 10, 2020), *available at* <http://www.puc.state.pa.us/pcdocs/1660096.pdf>.

¹⁸ PGW's Second Amended Universal Service and Energy Conservation Plan 2017-2022, Appendix G (Apr. 10, 2020), *available at* <http://www.puc.state.pa.us/pcdocs/1660096.pdf>.

1 amounts, and access to LIURP services. As discussed below, Mr. Colton also proposes
2 changes to PGW’s CRP outreach and enrollment processes.

3 **Q. AS A THRESHOLD MATTER, DO YOU BELIEVE THESE SUBSTANTIVE**
4 **MATTERS ARE APPROPRIATELY RAISED IN THIS PROCEEDING?**

5 A. No, they are not. The Commission already has a well-established process for utilities to
6 submit and explain the substance of their universal service programs for review and
7 approval, which allows the Commission to review the provision of universal services as a
8 whole, including outreach.¹⁹ There have already been opportunities provided to
9 interested stakeholders regarding PGW’s previous 2017-2020 USECP and the recently
10 approved Amended 2017-2022 USECP. While I understand that parties may raise the
11 reasonableness of PGW’s provision of service to low-income customers as part of their
12 recommendation as to whether PGW is providing reasonable and adequate service, Mr.
13 Geller and Mr. Colton are doing more – they are insisting on structural changes and
14 modifications to PGW’s programs. I do not believe that this distribution rate proceeding
15 is the appropriate forum to address non-financial Universal Service issues, or structural or
16 substantive components of Universal Service programs, particularly when those same
17 programs have recently been approved by the Commission and are subject to a pending
18 appeal before Commonwealth Court filed by the Office of Consumer Advocate and
19 Office of Small Business Advocate. I would note that TURN “enthusiastically”
20 supported PGW’s most recent CRP Pilot energy burden change since it would “result in
21 substantially improved affordability for CRP participants” and did not oppose the

¹⁹ See 52 Pa. Code § 62.4.

1 USECP.²⁰ Addressing comprehensive substantive USECP proposals outside of the
2 normal USECP review creates uncertainty about where these issues will be addressed,
3 whether the proposals are appropriate in light of the full Universal Service Plan
4 programs, undermines BCS's oversight of universal service programs and the PUC's
5 Orders approving filed programs, and requires additional Company and Commission
6 resources to address the same issues in multiple proceedings. In addition, the
7 Commission's process relies on the expertise of members of BCS to act as the
8 Commission's advisory team in the context of the non-adjudicatory universal service
9 proceeding.

10 As I mentioned, both Mr. Geller and Mr. Colton justify raising issues with the
11 CRP and USECP in this base rate proceeding as being necessary to determine whether
12 current and proposed rates are just and reasonable. However, both go well beyond
13 examining whether its overall rates or universal service costs are just and reasonable, and
14 demand that PGW make significant substantive changes to its full universal service
15 program design. These proposals are beyond the scope of this base rate proceeding.

16 In sum, Mr. Geller's and Mr. Colton's recommendations have already been
17 addressed through PGW's recently approved Amended USECP proceeding. Mr. Geller
18 and Mr. Colton may not be satisfied with the resulting PUC Order, but that does not
19 convert any of their substantive program objections into issues relevant to this
20 proceeding. Requiring PGW to take the recommended action on these program-specific
21 issues in this distribution rate proceeding is not appropriate.

22
²⁰ See Low Income Advocates' Letter in Lieu of an Answer, Mar. 2, 2020, at 3, Docket No. M-2019-3012599, available at <http://www.puc.state.pa.us/pcdocs/1656432.pdf>.

2. CRP Enrollment and Income Verification Procedures

Q. PLEASE SUMMARIZE MR. GELLER'S TESTIMONY REGARDING CRP ENROLLMENT PROCEDURES.

A. Mr. Geller testified that PGW's enrollment and income verification procedures may limit customers' ability to enroll in CRP. He is concerned that many customers apply for CRP in-person, but this option has not been available while PGW's customer service centers have been closed due to the COVID-19 pandemic. Mr. Geller is also concerned that declining numbers of CRP customers are receiving a bill based on the percentage of income ("PIPP"), as opposed to customers receiving a CRP Average Bill. Based on this, Mr. Geller concludes that PGW's rates for low-income customers are not just and reasonable and the proposed rate increase should not be approved. TURN St. No. 1 at 22-25.

To address these issues, Mr. Geller recommends that PGW: (1) provide an analysis of why the number of PIPP customers has decreased; (2) work with Community Based Organizations ("CBOs") to help process in-person CRP applications; and (3) set up a process for phone enrollment in CRP. TURN St. No. 1 at 23, 25-26.

Q. DO YOU AGREE WITH MR. GELLER'S RECOMMENDATIONS?

A. No. First, I believe that PGW's current enrollment procedures are sufficient to assist customers in enrolling in CRP, and provide customers with multiple means of application. PGW's customer service centers were closed due to the pandemic in order to protect the safety of our customers and employees, but customers can still enroll via mail and online, including uploading any required documentation through a smart device or computer. PGW continues to receive applications through these means. Additionally, upon information and belief, CBOs are also likely closed due to the pandemic and would

1 not be able to facilitate in-person applications as Mr. Geller suggests. In any event, the
2 processing of PGW's CRP applications is performed by union-covered employees and
3 could not be replaced with CBOs. Finally, Mr. Geller has identified no Commission
4 requirement that a utility offer in-person customer service centers or phone self-
5 certification enrollment.

6 **Q. DO YOU AGREE THAT PGW SHOULD PROVIDE AN ANALYSIS OF WHY**
7 **THE NUMBER OF PIPP CUSTOMERS HAS DECREASED?**

8 A. No, I do not. The number of CRP customers is not decreasing in recent years.²¹ CRP
9 customers pay the lower of a fixed annual bill amount or a bill based on the PUC's
10 affordable energy burden (PIPP). An increase in the number of CRP average bill
11 customers means that these customers have an energy burden that is lower than the one
12 deemed affordable by the PUC, and because they enroll in CRP they receive arrearage
13 forgiveness for their debt. PGW was required to implement the CRP Average Bill
14 pursuant to a PUC Order in a previous USECP filing.²²

15 Finally, as I discuss in greater detail herein, PGW voluntarily modified its CRP to
16 lower the applicable CRP energy burdens. When this change takes effect later this year,
17 PGW expects that the CRP Average Bill program participation will decrease and there
18 will be a corresponding increase in PIPP customers. Therefore, the analysis Mr. Geller
19 recommends is not necessary and will not provide useful information given the energy
20 burden changes that are currently being implemented (and, as discussed above, it is
21 beyond the scope of this proceeding).

²¹ See Mr. Peach's rebuttal testimony (PGW St. No. 11-R) for further discussion.

²² *See Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4*, Docket No. M-2016-2542415, Order (entered Aug. 3, 2017).

1 **Q. DOES MR. GELLER ALSO RECOMMEND CHANGES TO PGW'S INCOME**
2 **VERIFICATION PROCEDURES?**

3 A. Yes, Mr. Geller recommends that PGW accept self-verification of income and changes in
4 income for new CRP enrollment and recertification, both during the pandemic and
5 continuing afterward for two years as a pilot program. He testified that PGW's list of
6 accepted documents to verify income is too limited, and any type of documentation
7 should be accepted. TURN St. No. 1 at 27-29.

8 **Q. DO YOU AGREE WITH MR. GELLER'S RECOMMENDED CHANGES TO**
9 **THE CURRENT INCOME VERIFICATION PROCEDURES?**

10 A. No. While PGW encourages eligible customers to enroll in CRP, PGW is also obligated
11 to verify that customers meet the income requirements necessary to participate in the
12 program as this program is funded by its firm ratepayers. It is not advisable to have a
13 program as financially beneficial as PGW's without including fraud protections in it. The
14 documents PGW currently accepts to confirm eligibility are reasonable and provide PGW
15 with necessary information without being overly burdensome to customers. The current
16 procedures ensure that those who are in need of assistance are able to access the program;
17 self-verification could open the program to those who may not truly qualify and could
18 unfairly (and fraudulently) increase costs on the rest of PGW's ratepayers. For these
19 reasons, I do not agree with the recommendation to accept self-verification of income for
20 CRP enrollment or recertification.

21 **3. CRP Average Bill**

22 **Q. PLEASE DESCRIBE THE CRP AVERAGE BILL.**

23 A. PGW's CRP includes two billing options: (1) a percentage of income program which sets
24 a customer's CRP asked-to-pay amount based on a percentage of income (PIPP), and (2)
25 an Average Bill. When a customer enrolls in CRP, PGW examines whether the

1 customer's bill would be lower as a percentage of income or as an average bill, and then
2 gives the customer the lower option. PGW reviews the CRP bill options annually upon
3 recertification to confirm that the customer continues to receive the lowest bill. This
4 program assists customers by providing an affordable monthly bill at a consistent
5 amount, while also allowing the customer to earn arrearage forgiveness.

6 **Q. DOES MR. GELLER RAISE CONCERNS ABOUT THE CRP AVERAGE BILL?**

7 A. Yes. Mr. Geller testifies that the current CRP Average Bill may result in some Average
8 Bill customers potentially being charged more than they would otherwise have paid in
9 actual usage charges over the course of a year. TURN St. No. 1 at 32. Mr. Geller
10 recommends changes to PGW's implementation of the CRP Average Bill, including
11 adjusting CRP Average Bills on a quarterly basis, providing training for customer service
12 representatives on how adjustments are calculated and how customers can request a
13 review of their CRP amount, and conducting a comprehensive review of CRP Average
14 Bills to identify customers that were overcharged and adjusting their bill to reflect actual
15 usage. TURN St. No. 1 at 35.

16 **Q. DO YOU AGREE WITH MR. GELLER'S STATEMENT THAT PGW'S**
17 **ANNUAL REVIEW PROCESS FOR THE CRP AVERAGE BILL IS**
18 **INCONSISTENT WITH THE INTENT OF PRIOR COMMISSION ORDERS?**

19 A. No, I do not. Mr. Geller implies that PGW is out of compliance with its Commission-
20 approved USECP. PGW's current process does, in fact, comply with the applicable
21 orders. In PGW's 2017-2020 USECP proceeding, the Coalition for Affordable Utility
22 Service and Energy Efficiency in Pennsylvania ("CAUSE-PA") made an argument
23 similar to Mr. Geller's that PGW should be required to review the average bill amount on

1 a monthly basis to confirm that the customer is paying the most affordable bill.²³ The
 2 Commission rejected this argument and required PGW to “...review, at least once per
 3 year, CRP accounts to ensure customers are paying the most affordable CRP rate (*i.e.*,
 4 PIP or budget billing).”²⁴ PGW’s current Average Bill annual review process complies
 5 with this Order by reviewing CRP accounts annually with recertification.

6 Additionally, as discussed previously, the Commission recently reviewed and
 7 approved PGW’s Amended 2017-2022 USECP. Both the previous 2017-2020 USECP
 8 and the currently approved Amended 2017-2022 USECP include the following language:

9 CRP Recertification - CRP participants are required to recertify annually
 10 (6 months for zero income). See Appendix B for recertification flow.
 11 This requirement is waived for two years (2 years of recertification are
 12 waived) if the customer receives a LIHEAP grant and assigns it to PGW
 13 on an annual basis. However, for each customer who is granted a waiver
 14 from the recertification requirement, PGW will review their account
 15 annually on their anniversary date during the waiver period to verify if the
 16 CRP rate (PIPP or budget bill) continues to provide the most affordable
 17 monthly bill amount. If it is determined that the customer is better served
 18 on the other CRP rate, the customer will be put on the other (lower) CRP
 19 rate.²⁵
 20

21 Annual CRP Review – At least once per year, PGW will review each CRP
 22 account at recertification to ensure customers are paying the most
 23 affordable rate.²⁶
 24

25 The PUC has now approved this language twice, making clear that the Average Bill
 26 annual review process is clearly acceptable to the Commission.

²³ See *Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4*, Docket No. M-2016-2542415, Order entered Aug. 3, 2017, at 16.

²⁴ *Id.* at 19 (emphasis added).

²⁵ *Philadelphia Gas Works’ Second Amended Universal Service and Energy Conservation Plan 2017-2022*, dated Apr. 10, 2020, at 15, available at <http://www.puc.state.pa.us/pcdocs/1660096.pdf>.

²⁶ *Id.* at 16.

1 **Q. DO YOU HAVE A FURTHER RESPONSE TO MR. GELLER'S ARGUMENTS**
2 **REGARDING THE CRP AVERAGE BILL?**

3 A. Yes. Mr. Geller's argument ignores how PGW's Commission-approved CRP currently
4 works. PGW's program provides for a fixed monthly bill for the CRP customer's
5 program year unless they have a change in income. The CRP design provides for a point-
6 in-time analysis, and the customer pays the lower of (1) the energy burden deemed
7 appropriate by the Commission (as a percentage of income), or (2) the average bill at the
8 time of application or recertification. This fixed bill provides the customer with bill
9 consistency from one month to the next. A customer on a percentage of income bill is
10 not reanalyzed each month to see if the average bill is lower than the percentage of
11 income, and the fixed average bill is not compared against a new calculation of the
12 average bill. In fact, if a CRP Average Bill customer uses more than was expected on an
13 average bill CRP, the customer is not billed for that excess usage – the other firm
14 ratepayers absorb these costs. Mr. Geller believes that average bill customers should
15 receive a lower bill if their average bill decreases, but should not pay an increased bill in
16 their average bill increases.²⁷ Because of the way in which the average bill amount is
17 determined at a point in time, there will be average bill customers whose actual usage is
18 lower than their future usage in their CRP year and customers whose actual usage is
19 higher. While Mr. Geller focuses on customers whose actual usage is less than projected,
20 CRP Average Bill customers can also use more than projected. He ignores that CRP
21 Average Bill customers using more than projected would have their bill adjusted upward.
22 Notably, as acknowledged by Mr. Geller, the reverse discount does not necessarily show

²⁷ Response to PGW to TURN et al. I-11.

1 that a customer was “overcharged.”²⁸ By its nature, a fixed monthly bill heating program
2 will have months of reverse discount in warmer months.

3 Mr. Geller also neglects to acknowledge that all average bill CRP customers who
4 have pre-program debt are eligible to receive arrearage forgiveness as a benefit of their
5 CRP participation. If they were not on CRP they would be responsible for both their
6 arrearages and their actual monthly bill.

7 It should also be noted that customers on a CRP Average Bill are paying less than
8 the Commission-approved energy burden – which the PUC deems inherently affordable.
9 So, the average bill the customer is still paying less than the Commission-approved
10 energy burden. A customer is not required to participate in CRP, but must voluntarily
11 agree to join CRP in order to receive arrearage forgiveness.

12 Finally, PGW voluntarily (and before any other utility) petitioned the
13 Commission to modify its CRP to lower the new PUC energy burdens, which TURN
14 supported. With this change, it is expected that the CRP Average Bill program
15 participation will decrease. PGW expects that a good number of current CRP Average
16 Bill customers will be moved to the new percentages of income of 4% and 6% in PGW’s
17 CRP Pilot Program when the program is implemented this coming fall.²⁹

²⁸ TURN St. No. 1 at 34.

²⁹ *See Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. M-2016-2542415, and *Petition to Amend Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. P-2020-3018867, Order (entered Mar. 26, 2020).

4. LIURP Landlord Outreach

Q. PLEASE SUMMARIZE MR. GELLER'S TESTIMONY REGARDING LIURP OUTREACH TO LANDLORDS.

A. Mr. Geller is concerned that PGW tenant customers may be unable to access LIURP services due to a lack of landlord cooperation, and he recommends changes to PGW's process for obtaining landlord approval to perform LIURP services. He recommends that: (1) PGW should make multiple attempts to obtain landlord approval to perform LIURP services for a tenant, including direct contact with the landlord or their representative to explain LIURP benefits; and (2) PGW should work with the tenant to identify barriers to landlord approval and assign CARES representatives to follow-up with tenants and landlords and make referrals to other agencies or organizations. Further, Mr. Geller testified that unspent LIURP funds from 2019 should roll over to the 2020 budget, any unspent 2020 LIURP funds should likewise be rolled forward to the 2021 budget, and that some of these funds could be used for landlord outreach. TURN St. No. 1 at 36-39.

Q. HOW DO YOU RESPOND TO MR. GELLER'S LIURP LANDLORD OUTREACH RECOMMENDATIONS?

A. I do not agree with these recommendations, and I believe that PGW's current landlord outreach is sufficient. The additional outreach to landlords that Mr. Geller recommends could be time-intensive and possibly costly. More troubling is that Mr. Geller recommends this additional work and cost even though a good amount of LIURP work is actually a landlord's legal responsibility to address. Mr. Geller criticizes PGW based on low-income housing landlords' failure to accept free weatherization of their rental properties. Mr. Geller is proposing that ratepayers also fund extensive outreach to landlords who refuse free, ratepayer funded weatherization, some of which could make

1 their properties legally habitable. Furthermore, the additional cost of any such outreach
2 could outweigh any benefit gained through additional LIURP treatments.

3 Additionally, Mr. Geller's testimony ignores significant practical hurdles to
4 conducting additional outreach to landlords. For example, PGW often does not have
5 current and correct contact information for landlords. When asked how Mr. Geller
6 specifically suggested that PGW obtain this information, Mr. Geller did not provide a
7 direct response but rather repeated his testimony that PGW should work with tenant
8 customers to identify barriers and assign CARES representative to do additional legwork.
9 Mr. Geller similarly avoided the question of whether costly and time-consuming efforts
10 to contact uncooperative landlords is worth the added expense, particularly when PGW's
11 ratepayer are paying to have work performed that the landlord should do itself. Response
12 to PGW to TURN et al. I-14. While PGW encourages eligible tenant customers and
13 landlords to obtain LIURP treatment, I do not believe that the added costs of Mr. Geller's
14 proposals (which must be absorbed by other ratepayers) are justified.

15 **Q. DO YOU AGREE WITH THE RECOMMENDATION TO ROLL ANY UNSPENT**
16 **2019 AND 2020 LIURP FUNDS FORWARD?**

17 A. PGW's LIURP budgets are considered and approved in its USECPs. Those budgets are
18 annual spends. Due to the variable nature of LIURP job costs and the fact that PGW
19 cannot risk overspending beyond the PUC-approved annual budgets, PGW has used its
20 administrative cost budget to ensure spending levels at or very near the approved annual
21 budget. PGW spent 98.2% and 99.7% of its LIURP funds in 2018 and 2019,
22 respectively. These small amounts of funds that remain unspent are drawn from PGW's
23 administrative cost budget and show that the Company has been successful in managing
24 its budget spends within the approved limits.

1 **C. Other Low-Income Customer Service Issues**

2 **1. LIHEAP Crisis Grant Acceptance Policy**

3 **Q. DID MR. GELLER TESTIFY REGARDING PGW'S LIHEAP CRISIS GRANT**
4 **ACCEPTANCE POLICY?**

5 A. Yes. Mr. Geller recognized that, since its last base rate case, PGW has increased what
6 debt load it will accept for LIHEAP Crisis acceptance (called a "LIHEAP Crisis grant
7 acceptance policy" by Mr. Geller) to allow low-income customers to maintain service
8 when the LIHEAP Crisis grant amount is less than the full account balance due.
9 However, Mr. Geller wants PGW to go even farther and make a variety of additional
10 changes to its LIHEAP Crisis acceptance requirements. He recommends that PGW
11 should: (1) begin to track and maintain data on its LIHEAP Crisis acceptance policy and
12 maintain this data in a readily available data bank; (2) review its LIHEAP Crisis
13 acceptance requirements to determine whether additional modifications would increase
14 the number of customers able to obtain assistance, including allowing customers to
15 restore service even if the grant is not enough to pay the restoration amount; (3) perform
16 an annual cost/benefit analysis to determine whether the Crisis threshold is set at a level
17 that will allow all eligible Crisis applicants to maintain or restore service, including
18 ensuring policies are in place for customers to afford arrears that are not paid off by the
19 grant; and (4) ensure that information about the Crisis acceptance policy is widely
20 available through brochures, bill messages, website, and other communications
21 throughout LIHEAP season. TURN St. No. 1 at 44-45.

22 **Q. AS A PRELIMINARY MATTER, PLEASE RESPOND TO MR. GELLER'S**
23 **STATEMENT THAT PGW DID NOT CONDUCT A COST/BENEFIT ANALYSIS**
24 **AS REQUIRED BY THE SETTLEMENT OF ITS 2017 BASE RATE CASE.**

1 A. Mr. Geller wrongly accuses PGW of failing to comply with a settlement provision from
2 its 2017 base rate case by not providing a cost/benefit analysis of the impact of modifying
3 its LIHEAP Crisis acceptance policy. TURN St. No. 1 at 44. PGW did, in fact, provide
4 this cost/benefit analysis as required by the 2017 Settlement after the conclusion of the
5 base rate case at Docket No. R-2017-2586783. In response to an interrogatory, Mr.
6 Geller admitted that PGW did provide the required cost/benefit analysis. Response to
7 PGW to TURN et al. I-12.

8 **Q. HOW DO YOU RESPOND TO MR. GELLER'S RECOMMENDED CHANGES**
9 **TO PGW'S LIHEAP CRISIS GRANT ACCEPTANCE POLICIES?**

10 A. I do not agree with Mr. Geller's proposed changes, and I believe that PGW's current
11 LIHEAP Crisis acceptance policy is reasonable and appropriate. Mr. Cummings has also
12 addressed some of Mr. Geller's proposals. PGW sets a limit on the amount of debt a
13 customer may have for PGW to accept a Crisis grant assignment from the customer and
14 discontinue the terminations process for the customer. Crisis grants are provided to
15 consumers whose service is in danger of termination – he/she has received a termination
16 notice – or has been shut off. Mr. Geller has coined the debt limit PGW will accept as a
17 “Crisis acceptance policy.”

18 As Mr. Geller mentioned in his testimony, LIHEAP is administered by the
19 Department of Human Services (DHS). In Philadelphia, the Philadelphia County
20 LIHEAP office is responsible for processing applications received for PGW customers.
21 The Crisis acceptance debt amount limit provides the staff at the Philadelphia LIHEAP
22 office with guidance on what criteria must be met in order for a grant to be accepted to
23 assist them with processing time. It also affords PGW's hardship fund, USEF, with
24 guidance in order to determine eligibility for additional assistance to provide PGW

1 customers with even further aid towards their PGW bill. LIHEAP applicants do not
2 contact PGW, they contact DHS, and DHS administers the LIHEAP program. Mr.
3 Geller's request for database tracking should be directed to DHS, not PGW.

4 PGW does not "advertise" how much debt a customer can accumulate and still
5 maintain service through a Crisis grant regardless of the amount of that grant. It is not
6 advisable to encourage customers to accumulate debt since they will still be responsible
7 for any amount the grant does not satisfy. Notably, PGW does perform significant
8 outreach annually to customers about LIHEAP Crisis grants. For example, in FY19,
9 PGW mailed approximately 69,000 letters encouraging customers to apply for a LIHEAP
10 Crisis grant.

11 Further, contrary to Mr. Geller's claims, PGW has reviewed and analyzed the
12 limit it places on the amount of unreimbursed debt a customer may have for PGW to
13 accept the customer's assignment of a Crisis grant to PGW – most recently in connection
14 with the FY2019 season. In the FY2019 season, PGW increased the amount of debt it
15 would allow from \$2,500 to \$3,000, and PGW performed outreach to customers based on
16 this arrearage amount. I would note that I am informed by counsel that PGW is not
17 mandated by PUC regulation to accept the assignment of a Crisis grant and discontinue
18 the termination process, particularly when the debt carried by the customer will remain
19 unpaid.

20 Finally, Mr. Geller appears to want PGW to accept a Crisis grant and not
21 terminate a customer's service, or restore service, regardless of how much of the
22 customer's debt PGW and its ratepayers will continue to shoulder. In contrast to this
23 approach, PGW reviews and sets a threshold that will assist a significant number of its

1 customers, and has changed this amount over time. PGW must take into consideration the
 2 potential impact to all ratepayers in its decision-making process. In order to assist
 3 customers, they are provided with information on how to apply for CRP as well as the
 4 Company's hardship fund.

5 **2. PGW's Compliance with the Discontinuance of Service to Leased**
 6 **Premises Act ("DSLPA")**

7 **Q. PLEASE SUMMARIZE MR. GELLER'S TESTIMONY REGARDING PGW'S**
 8 **COMPLIANCE WITH DLSPA.**

9 A. Mr. Geller believes that PGW is not making sufficient effort to determine whether
 10 properties are tenant occupied and providing notice to affected tenants of their ability to
 11 avoid termination under DSLPA Subchapter B, and that the process for establishing
 12 tenant Subchapter B accounts is too onerous. He recommends that PGW: (1) accept a
 13 broad range of identification documents and proof of address for purposes of establishing
 14 tenant "Et-al accounts"; (2) adopt a more aggressive approach to determining which
 15 properties are likely to be tenant occupied by compiling information from a broad range
 16 of public records; and (3) generally that PGW make every effort to determine whether the
 17 property is likely to be tenant occupied prior to shutoff for non-payment. TURN St. No. 1
 18 at 45-50.

19 **Q. HOW TO YOU RESPOND TO MR. GELLER'S RECOMMENDATIONS?**

20 A. I do not agree with Mr. Geller's recommendations. PGW's current practices are
 21 compliant with DSLPA requirements at 66 Pa. C.S. § 1521 et seq. ("Discontinuance
 22 Statute") and the proposed changes are neither necessary nor required.

23 **Q. DOES DSLPA REQUIRE PGW TO ACTIVELY IDENTIFY PROPERTIES THAT**
 24 **ARE REASONABLY LIKELY TO BE TENANT OCCUPIED?**

1 A. I am advised by counsel that the Discontinuance Statute does not require PGW to seek
2 out properties that are likely to be occupied by a tenant through searching a broad array
3 of public records, as Mr. Geller proposes. Rather, the landlord has the duty to notify
4 PGW that a property is used for rental purposes.³⁰ The exhaustive search process that Mr.
5 Geller proposes would be costly and time consuming, and is not required by the
6 Discontinuance Statute.

7 **Q. PLEASE RESPOND TO MR. GELLER’S PROPOSAL THAT PGW ACCEPT A**
8 **BROAD RANGE OF IDENTIFICATION AND PROOF OF ADDRESS**
9 **DOCUMENTATION FOR ESTABLISHING TENANT ET AL. ACCOUNTS.**

10 A. For identification purposes to establish a tenant Et-al account, PGW currently accepts
11 government-issued photo identification, medical assistance card, food stamp
12 identification, or similar documents issued by a state or federal agency which contains the
13 tenant’s name and address. To verify residency, PGW accepts a current lease, utility bill,
14 or any similar document in the tenant’s name demonstrating the tenant’s residency at the
15 address. I am advised by counsel that these forms of identification are compliant with the
16 Discontinuance Statute, which requires that a tenant provide “reasonable identification”
17 such as a driver’s license, photo identification, medical assistance or food stamp
18 identification, or any similar document issued by a public agency that contains the
19 tenant’s name and address.³¹ PGW’s current process for establishing tenant et al.
20 accounts and the types of documentation required are reasonable and in compliance with
21 the Discontinuance Statute.

22

³⁰ 66 Pa. C.S. § 1529.1.

³¹ See 66 Pa. C.S. § 1527(b).

1 **3. Protections for Victims of Domestic Violence**

2 **Q. PLEASE DESCRIBE MR. GELLER’S TESTIMONY REGARDING PGW’S**
3 **PROTECTIONS FOR VICTIMS OF DOMESTIC VIOLENCE.**

4 A. Mr. Geller is concerned that PGW is not providing protections to victims of domestic
5 violence as required by statutory changes in 2014 allowing proof through any court order
6 issued by a court of competent jurisdiction in Pennsylvania that provides clear evidence
7 of domestic violence. He recommends that PGW make a number of modifications,
8 including that PGW should: (1) create a written policy for how it handles domestic
9 violence cases; (2) prioritize calls from victims of domestic violence to a designated team
10 trained to handle domestic violence cases; (3) give domestic violence victims should at
11 least three days to provide a copy of a court order evidencing domestic violence; (4)
12 expressly define the payment arrangement parameters for victims of domestic violence
13 and provide training to staff; (5) develop training materials for customer service
14 representatives explaining the rights of domestic violence victims and the process for
15 handling these calls; (6) partner with local domestic violence programs to provide
16 reciprocal training, and train specific PGW liaisons to work with advocates; and (7)
17 update and expand public materials such as the website, flyers and bill messaging to
18 identify domestic violence protections and required documentation. TURN St. No. 1 at
19 50-54.

20 **Q. HAS PGW UPDATED ITS PRACTICES TO ACCEPT ANY COURT ORDER**
21 **FROM A COURT OF COMPETENT JURISDICTION IN PENNSYLVANIA**
22 **PROVIDING CLEAR EVIDENCE OF DOMESTIC VIOLENCE?**

23 A. Yes, such orders are reviewed in PGW’s regulatory departments to determine if statutory
24 requirements have been met.

1 **Q. DO YOU AGREE WITH MR. GELLER’S OTHER RECOMMENDATIONS**
 2 **REGARDING PGW’S POLICIES AND PRACTICES FOR PROTECTING**
 3 **VICTIMS OF DOMESTIC VIOLENCE?**

4 A. No. While PGW takes domestic violence and the protections afforded to victims very
 5 seriously, I do not believe that Mr. Geller’s extensive proposals are warranted. Mr. Geller
 6 failed to present any evidence that would show that these extensive (and costly)
 7 initiatives were necessary. PGW is in compliance with current legal requirements, and
 8 refers all customers with statutorily recognized evidence of domestic violence to its
 9 Universal Service department for handling.

10 **4. Reconnection Policies**

11 **Q. DID MR. GELLER TESTIFY REGARDING PGW’S RECONNECTION**
 12 **POLICIES?**

13 A. Yes, Mr. Geller testified that PGW should adopt more flexible reconnection policies for
 14 customers who have been disconnected. Specifically, he recommended that PGW should:
 15 (1) maintain detailed data on the status of disconnected properties; (2) work with
 16 disconnected customers to reconnect on affordable terms; (3) analyze the financial impact
 17 of keeping customers off the system; (4) review and modify policies for customers that
 18 have been disconnected due to unauthorized use; and (5) adopt flexible reconnection
 19 policies for the duration of the COVID-19 pandemic including the waiver of reconnection
 20 fees. TURN St. No. 1 at 61-65.

21 **Q. DO YOU AGREE WITH THESE RECOMMENDATIONS?**

22 A. No. I believe that PGW’s current reconnection policies are reasonable. Each year PGW
 23 performs a Cold Weather Survey and Re-survey as required by the Commission. As part
 24 of this survey, PGW performs outreach to those whose service was terminated that year

1 and is still off with information on how to restore service, including the availability of
 2 grants as well as CRP.

3 With respect to customers impacted by the COVID-19 pandemic, PGW has not
 4 terminated a residential customer for non-payment since November of 2019. Thus, any
 5 customer impacted financially by the pandemic has not had service terminated for
 6 nonpayment.

7 Finally, with respect to customers terminated for unauthorized use, PGW is
 8 statutorily authorized to terminate for unauthorized use of service immediately and
 9 without notice³² – this is evidence of the heightened legislative and PUC safety interests
 10 in ensuring that unauthorized usage is not allowed to continue. PGW policies on
 11 unauthorized use are consistent with these legislative and PUC safety concerns.

12 **III. RESPONSES TO DIRECT TESTIMONY OF ROGER COLTON**

13 **Q. DID YOU REVIEW THE DIRECT TESTIMONY OF OCA WITNESS ROGER**
 14 **COLTON?**

15 A. Yes, I did.

16 **Q. PLEASE SUMMARIZE THE AREAS OF MR. COLTON’S TESTIMONY TO**
 17 **WHICH YOU WISH TO RESPOND.**

18 A. Mr. Colton challenges several of PGW’s proposals and makes several recommendations
 19 related to PGW’s current practices and procedures. I will address Mr. Colton’s testimony
 20 related to the following: 1) PGW’s proposed residential customer charge, to the extent it
 21 touches on low-income programming; and 2) PGW’s management quality, efficiency and
 22 effectiveness, customer service, and universal service practices. It should be noted that

³² See 66 Pa. C.S. § 1406(c); 52 Pa. Code § 56.98.

1 Mr. Colton raises certain issues and makes certain arguments that were also raised by Mr.
2 Geller. Where appropriate, my discussions pertaining to one witness should be construed
3 as responding to both witnesses.

4 **A. Residential Customer Charge**

5 **Q. ON WHAT GROUNDS DOES MR. COLTON CHALLENGE PGW'S PROPOSED**
6 **RESIDENTIAL CUSTOMER CHARGE?**

7 A. Mr. Colton argues that the proposed residential customer charge will have adverse
8 impacts on low-income customers. In making this claim, Mr. Colton asserts that low-
9 income customers are, on average, low usage customers and that these customers have
10 greater payment difficulties and are in greater arrears. Mr. Colton also implies that the
11 proposed customer charge is too high, making an irrelevant comparison to 2019-2020
12 LIHEAP cash grants. *See* OCA St. No. 5 at 12-13, 16-21, 24-35, 57-59.

13 Finally, Mr. Colton alleges that PGW's Customer Responsibility Program
14 ("CRP") does not protect low-income customers from harm caused by an increased
15 customer charge because the CRP reaches a small proportion of eligible customers and
16 because the "average bill" customers in the CRP will be impacted. Mr. Colton testifies
17 that the percentage of customers receiving average bills is increasing. *See* OCA St. No. 5
18 at 13-15, 51-58.

19 **Q. HOW DO YOU RESPOND TO MR. COLTON'S TESTIMONY THAT PGW'S**
20 **PROPOSED RESIDENTIAL CUSTOMER CHARGE WILL HAVE ADVERSE**
21 **IMPACTS ON LOW-INCOME CUSTOMERS?**

22 A. In the Rebuttal Testimony of PGW witness Kenneth Dybalski, Mr. Dybalski explains
23 how the residential customer charge reflects a proper allocation of costs, results in an
24 affordable bill for residential customers, and still provides customers with an opportunity
25 to save money by lowering energy usage.

1 When examining Mr. Colton’s testimony regarding PGW’s customer charge and
2 LIHEAP, he indicates that PGW experienced a 22% decrease in LIHEAP Cash grants
3 when comparing FY2018 to FY2020. However, his examination of PGW’s LIHEAP
4 receipts requires explanation. As one issue, the dollars mentioned in Mr. Colton’s
5 testimony for FY 2018 included supplemental grant dollars issued by DHS months after
6 the program closed (~\$3.3 million). Supplemental grants are additional grants paid to
7 recipients of grants in that year by the Department of Human Services (DHS) based on
8 criteria DHS utilizes during the LIHEAP season.

9 Furthermore, the dollars cited for FY2020 do not include all LIHEAP Cash
10 dollars received as applications are still being processed. When comparing the actual
11 dollars received for those two years, PGW received \$15.4 million non-supplemental grant
12 dollars in LIHEAP Cash in FY 2018 and \$15.3 million non-supplemental grant dollars in
13 LIHEAP Cash in FY2020 thus far (grants are still being received). This represents a less
14 than one percent decrease between these two fiscal years, thus far.

15 Additionally, Mr. Colton does not include LIHEAP Crisis dollars in his criticism.
16 When examining the total LIHEAP dollars – Cash and Crisis grants - that PGW received
17 in FY2019, PGW received approximately \$19.7 million dollars compared to \$20.2
18 million dollars for FY2020, to date.³³ DHS is still paying and processing grants for the
19 FY2020 season. The average LIHEAP grant per customer also increased from FY2019 to
20 FY2020 from \$280 to \$288 per recipient respectively. A further point to note is that the
21 overall funding received as a percentage of dollars issued by the Department of Human
22 Services (“DHS”) has not decreased - PGW’s percentage share of overall funding

³³ This information is an update to OCA Set III-2.

1 received from LIHEAP in Philadelphia has remained consist at approximately 72% of the
2 grant dollars issued in Philadelphia.

3 **Q. HOW DO YOU RESPOND TO MR. COLTON’S ASSERTION THAT LIHEAP**
4 **GRANTS ARE PERTINENT TO PGW’S RATE INCREASE?**

5 A. With respect to the LIHEAP program, PGW does not administer the program, and the
6 consumer decides to which energy provider to assign his/her grant. The grant belongs to
7 the customer and he/she consents to it being paid to PGW. In fact, Mr. Colton admits that
8 LIHEAP recipients determine to which utility to assign a grant, and have a “property
9 interest” in LIHEAP grants. (OCA Response to PGW Set III-19&20). This is a federal
10 grant program, and has nothing to do with PGW’s rate requirements. PGW submits that
11 its rate requirements should not be set based on whether and in what amount customers
12 assign PGW for receipt of their LIHEAP monies. Customers can, for example, choose to
13 assign their grant(s) to PECO.

14 **Q. HOW DO YOU RESPOND TO MR. COLTON’S TESTIMONY THAT LOW-**
15 **INCOME CUSTOMERS, GENERALLY, HAVE GREATER PAYMENT**
16 **DIFFICULTIES AND ARE IN GREATER ARREARS?**

17 A. I do not believe that many people would dispute that low-income customers, generally,
18 could be expected to have greater payment difficulties and in many instances be in
19 greater arrears than middle- to high-income customers. I want to emphasize, however,
20 that Mr. Colton paints a faulty picture of how PGW handles customer payment
21 difficulties and arrears and relies on narrow and limited information to draw his
22 conclusions. PGW witness Gil Peach addresses this assertion further in his Rebuttal
23 Testimony. Contrary to Mr. Colton’s assertion, however, PGW’s collection performance,
24 payment plan efforts, and disconnection rates are appropriate and reasonable.

1 **Q. HOW DO YOU RESPOND TO MR. COLTON'S TESTIMONY THAT CRP WILL**
2 **NOT PROTECT LOW-INCOME CUSTOMERS FROM HARM INCURRED BY**
3 **THE PROPOSED RESIDENTIAL CUSTOMER CHARGE?**

4 A. I disagree with Mr. Colton's testimony that CRP will not protect low-income customers
5 from financial harm. Mr. Colton's conclusion is based on the assertions that CRP
6 "average bill" customers will be impacted by an increase in the residential customer
7 charge. Mr. Colton's conclusion appear to be based on a misunderstanding or lack of
8 knowledge regarding PGW's CRP.

9 CRP provides all low-income customers with a fixed monthly bill, in a monthly
10 bill amount deemed affordable by the PUC. As explained above, the CRP bill amount is
11 based on the LOWER of either a fixed energy burden approved by the PUC as affordable
12 (pursuant to PUC reviewed and approved Universal Service and Energy Conservation
13 Plans) or the customer's average bill at the point in time of enrollment. All CRP
14 participants also receive pre-program arrearage forgiveness if they have any and pay their
15 CRP bill.

16 If a rate change increased the average bill amount, existing CRP customers should
17 not be impacted since PGW does not adjust the monthly average bill amount during the
18 customer's CRP year. When the customer recertifies their CRP eligibility, their monthly
19 amount will be recalculated and, again, the customer will pay the LOWER of the PUC's
20 affordable fixed energy burden or the average bill amount. Although PGW agrees that the
21 average bill will be higher due to an increase in the customer charge, the customer will
22 not be asked to pay an amount that exceeds the PUC's fixed, affordable energy burden.
23 Mr. Colton does not provide support for his apparent belief that PGW should provide a
24 bill program that is lower than the PUC's affordable energy burden - even though Mr.
25 Colton admits that the percentage of income a CRP customer should pay is not at issue in

1 this rate case. (OCA Response to PGW Set III-23) Instead of recognizing that the
2 authority to set a reasonable energy burden bill for low-income programs lies with the
3 PUC and that the PUC has, in fact, established such energy burdens, Mr. Colton appears
4 to believe that affordability is a “term of art.” (OCA Response to PGW Set III-29)

5 Mr. Colton also ignores PGW’s new CRP pilot program – perhaps because OCA
6 has opposed it on appeal – which will lower CRP energy burdens (to 4% or 6% of
7 income) and will by its nature reduce average bill program participation. Mr. Colton
8 admits that his testimony does not address changes to CRP under the new pilot program.
9 (OCA Response to PGW Set III-16). PGW expects that a good number of current CRP
10 Average Bill customers will be moved to the new percentages of income (4% and 6%) in
11 PGW’s CRP Pilot Program when the program is implemented this coming fall.

12 PGW submits that the energy burden deemed affordable by the PUC for CRP is
13 not at issue in this rate case. Even though Mr. Colton admits this, his arguments regarding
14 the average bill CRP appear to be attempting to make this an issue in the rate case. In
15 conclusion, under PGW’s CRP, a customer will not be required to pay more than the
16 PUC’s affordable energy burden. Recently, the PUC concluded an extensive investigation
17 of customer assistance program energy burdens. PGW’s new CRP pilot program provides
18 energy burdens, starting this fall, that are consistent with the new PUC energy burdens.
19 OCA has appealed PGW’s pilot program but implementation of it has not been stayed;
20 this rate case should not be used in an attempt to revise the PUC’s approval of PGW’s
21 pilot program.

1 **B. Management Quality, Efficiency and Effectiveness, Customer Service, and**
2 **Universal Service Practices**

3 **Q. PLEASE SUMMARIZE MR. COLTON’S TESTIMONY RELATED TO**
4 **MANAGEMENT QUALITY, EFFICIENCY AND EFFECTIVENESS,**
5 **CUSTOMER SERVICE, AND UNIVERSAL SERVICE PRACTICES.**

6 A. In this section of his testimony, Mr. Colton examines data published by the Pennsylvania
7 Public Utility Commission and makes a number of weak conclusions related to: 1)
8 winter shut-off data; 2) PGW’s collections performance; and 3) PGW’s customer service
9 performance and customer satisfaction. *See* OCA St. No. 5 at 37-51. PGW witness Gil
10 Peach addresses Mr. Colton’s testimony related to PGW’s collections performance.

11 In his Rebuttal, Mr. Colton also suggests that PGW’s CRP can help PGW address
12 alleged inability-to-pay issues. According to Mr. Colton, however, PGW has under-
13 identified the number of low-income customers living in its service territory and performs
14 poorly in enrolling low-income customers in its CRP. *See* OCA St. No. 5 at 51-58. As
15 such, Mr. Colton recommends that PGW should be required to make affirmed
16 solicitations for low-income customers to enroll in CRP and to develop an enhanced
17 Consumer Education and Outreach Plan with input from stakeholders. Under Mr.
18 Colton’s proposal, the Plan should identify efforts to educate and enroll eligible and
19 interested customers at or below 50% of the Federal Poverty Income Guidelines. OCA
20 St. No. 5 at 60.

21 **Q. WHAT SPECIFIC CONCLUSIONS DOES MR. COLTON MAKE WITH**
22 **RESPECT TO WINTER SHUT-OFF DATA?**

23 A. Mr. Colton challenges PGW’s responsiveness to disconnections. Mr. Colton testifies
24 that, while PGW has 18% of the state’s natural gas customers, it has from 62% to 71% of
25 the state’s gas customers who remain without heating service at the beginning of the cold
26 weather season over the past five years. OCA St. No. 5 at 38-39.

1 **Q. HOW DO YOU RESPOND?**

2 A. Mr. Colton neglects to mention that the PUC has identified PGW as having the highest
3 proportion of low-income customers of any gas or electric utility. The PUC's most recent
4 Universal Service Report, of 2018, estimates that over 43% of PGW customers are low-
5 income. This far exceeds the gas industry average of 26.7%³⁴ and electric industry
6 average of 24.9%.³⁵ Such reality clearly has impact on PGW collections. Mr. Colton also
7 neglects to examine any of PGW's Cold Weather Survey improvements over the years.

8 When examining Mr. Colton's testimony pertaining to winter terminations, he
9 states that he evaluated the Commission's Cold Weather Survey results from 2015
10 through 2019. Mr. Colton states that the reports for these years show that PGW failed to
11 demonstrate a reduction in the number of households without service. OCA St. No. 5 at
12 38-39. However, as his data table entitled "Table 12" demonstrates, the number of
13 households without service within PGW's service territory has decreased, dropping from
14 9,053 premises in 2015 to 7,222 in 2019 - a 20.2% reduction in the number of households
15 without service.

16 Moreover, Mr. Colton also failed to describe PGW's reconnection rate for
17 customers. Per the PUC, the reconnection rate is the comparison of the number of
18 customers restored versus the total terminated in a year. According to the PUC's 2015

³⁴ Pa. Public Utility Commission's Report on 2018 Universal Service Programs & Collections Performance (Dec. 2019), at 7, available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf ("PUC 2018 Universal Service Programs and Collections Report").

³⁵ PUC 2018 Universal Service Programs and Collections Report at 6.

1 Universal Service Report, PGW's reconnection rate was 66.5%.³⁶ In comparison,
 2 PGW's reconnection rate for 2018 was 69%.³⁷ Further, the reconnection rate for PGW's
 3 confirmed low-income households has improved since 2015 as well. In 2015, the PUC's
 4 Universal Service Report shows that PGW's confirmed low-income reconnection rate
 5 was 72.2%.³⁸ In its 2018 report, PGW's confirmed low-income rate increased to 76.3% -
 6 the second highest reconnection rate of all the regulated gas utilities.³⁹ This rate is also
 7 higher than the gas industry average of 69.6%.⁴⁰

8 **Q. DO YOU AGREE WITH MR. COLTON THAT PGW HAS UNDER-IDENTIFIED**
 9 **THE NUMBER OF LOW-INCOME CUSTOMERS LIVING IN ITS SERVICE**
 10 **TERRITORY?**

11 A. No. In PGW's last Universal Service and Energy Conservation Impact Evaluation,⁴¹ the
 12 Applied Public Policy Research Institute for Study and Evaluation (APPRISE) found that
 13 there were 120,197 CRP income eligible heating customers in PGW's service territory
 14 and 135,158 CRP income eligible heating and non-heating customers in PGW's service
 15 territory.⁴² APPRISE also found that when you include PGW customers who participate
 16 in the senior citizen discount, PGW had a CRP participation rate of 50-54% of its eligible

³⁶ Pa. Public Utility Commission's Report on 2015 Universal Service Programs & Collections Performance, at 15, available at http://www.puc.state.pa.us/filing_resources/universal_service_reports.aspx ("PUC 2015 Universal Service Programs and Collections Report").

³⁷ Pa. Public Utility Commission's Report on 2018 Universal Service Programs & Collections Performance (Dec. 2019), at 18.

³⁸ PUC 2015 Universal Service Programs and Collections Report at 16.

³⁹ PUC 2018 Universal Service Programs and Collections Report at 19. UGI was excluded due to their reconnection rate being impacted by their system conversion.

⁴⁰ PUC 2018 Universal Service Programs and Collections Report at 19.

⁴¹ See 52 Pa. Code §§ 62.1-62.8.

⁴² Philadelphia Gas Works Universal Service Impact Evaluation Final Report (March 2019), at 21, available at <http://www.puc.state.pa.us/pcdocs/1614503.pdf>.

1 low-income customers.⁴³ In contrast, Mr. Colton claims that PGW has only 11% of its
2 total customer base enrolled in CRP and that this is a performance failure.

3 Some of the numbers Mr. Colton uses could be deceiving if used without
4 explanation. Mr. Colton uses numbers from the PUC's Universal Service and Collections
5 Report as "confirmed" low-income (149,217 in the year 2019 or 31.2% of customers) –
6 in fact this number reflects instances where there was some indicia of low-income status
7 over the past 2 years. Mr. Colton also uses a number of "estimated" low-income
8 customers from the PUC's Universal Service report (206,533). However, perhaps Mr.
9 Colton is unaware that this PUC number is based only on census data for the service
10 territory.⁴⁴ Clearly the PUC utilizes a count based on this data in order to provide
11 reporting consistency across the Commonwealth. However, this number is a count of all
12 low-income Philadelphia residents, including those who do not have gas service and
13 those who live in apartment buildings and retirement homes where gas service is held by
14 the building owners, and thus should not be used for the purposes for which Mr. Colton is
15 using it. Mr. Colton also claims that a point in time enrollment for CRP is the total
16 enrolled over time. *See* OCA St. No. 5 at 53. Mr. Peach addresses these assertions of
17 Mr. Colton further.

18 **Q. DO YOU AGREE WITH MR. COLTON'S CRITICISM OF PGW'S**
19 **PERFORMANCE IN ENROLLING LOW-INCOME CUSTOMERS IN THE CRP?**

20 A. No, as explained by PGW witness Gil Peach in his Rebuttal Testimony. Further, as
21 explained by Mr. Colton himself in the past a lack of participation in a low-income

⁴³ *Id.* at 24.

⁴⁴ PUC 2018 Universal Service Programs and Collections Report at 6.

1 program, such as LIHEAP is not a failure in outreach or enrollment performance.⁴⁵ As

2 Mr. Colton stated (underlining mine):

3 The focus of attention on outreach should not be construed as indicating that
 4 nonparticipation in public benefit programs such as LIHEAP is exclusively a
 5 function of inadequate (or inappropriate) outreach. We know better than to reach
 6 that conclusion. There is an entire array of reasons why persons do not enroll in
 7 available public benefit programs. Some persons do not perceive themselves to be
 8 in need of assistance, and some are correct in so believing this. Some persons
 9 believe that, given limited government funds, other persons or households would
 10 be "more in need" than they are. Some persons do not believe that the amount of
 11 assistance that is available is "worth the effort" that it takes to enroll in the
 12 program. Some persons do not wish to be seen as taking advantage of "welfare"
 13 benefits. As can be seen, many of these reasons for nonparticipation involve either
 14 a lack of need, or a lack of desire to participate in the program.

15 Aside from these reasons for nonparticipation, however, there are other reasons
 16 for nonparticipation which involve a variety of personal and institutional *barriers*
 17 which *prevent* enrollment in programs such as LIHEAP.
 18

19 **Q. HOW DO YOU RESPOND TO MR. COLTONS' RECOMMENDATION THAT**
 20 **PGW SHOULD BE REQUIRED TO MAKE AFFIRMED SOLICITATIONS FOR**
 21 **LOW-INCOME CUSTOMERS TO ENROLL IN CRP AND DEVELOP AN**
 22 **ENHANCED CONSUMER EDUCATION AND OUTREACH PLAN?**

23 A. PGW's customer service representatives receive extensive annual training on CRP in
 24 order to ensure that they understand the program and will encourage low-income
 25 customers to enroll.⁴⁶ In fact, in 2018 PGW voluntarily implemented online enrollment
 26 for CRP, including via smart device.

⁴⁵ *Outreach Strategies for Iowa's LIHEAP Program: Innovation in Improved Targeting* (September 2000), at 1, available at <http://www.fsconline.com/downloads/Papers/2000%2009%20iowa-outreach.pdf> (emphasis added).

⁴⁶ *See Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. M-2016-2542415, and *Petition to Amend Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. P-2020-3018867, Order (entered Mar. 26, 2020); *see also 2019 Amendments to Policy Statement on Customer Assistance Program*, 52 Pa. Code § 69.261–69.267, Final Policy Statement and Order, Docket No. M-2019-3012599 (Nov. 5, 2019) ("Utilities should develop enhanced Consumer Education and Outreach Plans with input from stakeholders and submit them as part of their addendums initially and their proposed USECP filings going forward.").

1 As was explained in its Outreach Plan:⁴⁷

2
3 PGW uses various forms of communication to perform outreach regarding our
4 universal service programs. These methods vary from direct communication to mass
5 advertising. As part of our outreach efforts, PGW strives to encourage customers to
6 apply for each program. In addition, the company also makes a diligent effort to
7 educate customers on the many benefits that each program provides. Provided below
8 is an outline of the various types of communication used to interact with low-income
9 customers.

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15 educate customers on the many benefits that each program provides. Provided below
16 is an outline of the various types of communication used to interact with low-income
17 customers.

18
19 **Direct Contact**

- 20 • Mailings- PGW conducts multiple direct mailing campaigns annually to encourage
21 income-eligible customers to apply for CRP, UESF, LIHEAP and Crisis. This process
22 entails sending both letters and/or postcards to potentially eligible customers to inform
23 them about the benefits of each program and how to apply.
- 24 • Outbound Calls- PGW also utilizes outbound calls to perform direct outreach. These
25 calls consist of providing information about eligibility, as well as how to apply. The
26 outbound call function also provides customers with the ability to request an application
27 be mailed directly to their home.
- 28 • CSR Training- PGW routinely trains its entire customer-facing staff such as our
29 Customer Service Representatives (CSRs) regarding the company's universal service
30 programs. As part of their training curriculum, representatives are provided with talking
31 points, manuals and resource guides to ensure that they are properly prepared to educate
32 customers on the importance and benefits of each program.
- 33 • Customer Service Centers- PGW currently has five customer service centers throughout
34 the city of Philadelphia. There are CSRs available in each office to assist customers with

⁴⁷ PGW's Second Amended Universal Service and Energy Conservation Plan 2017-2022, Appendix G (Apr. 10, 2020), available at <http://www.puc.state.pa.us/pcdocs/1660096.pdf>; see also *Philadelphia Gas Works Universal Service an Energy Conservation Plan for 2017-2022*, Docket No. M-2016-2542415, and *Petition to Amend Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2017-2022*, Docket No. P-2020-3018867, Order (entered Mar. 26, 2020).

1 addressing account inquiries, CRP applications and the completion of LIHEAP
2 applications.

- 3 • Bill Inserts- In addition to letters, PGW also dedicates space in its monthly newsletter,
4 The Good Gas News, to perform outreach to customers. These communications include
5 promoting CRP as well as the availability of grants such as LIHEAP, Crisis and UESF.

6 **Mass Media Campaigns**

- 7 • PGW advertises its assistance programs on the radio, TV, mass transit and in community
8 newspapers. Much of the advertising is targeted to communities that have the highest
9 density of customers who can benefit from PGW's programs. In addition, PGW also
10 promotes its assistance programs on the company's website www.pgworks.com.
11 Throughout the site, there are descriptions of each program, as well as link or direct
12 access to applications for customers to download.

13 **Community Outreach**

- 14 • Community Events- PGW attends numerous community events throughout the year to
15 promote its assistance programs. These events provide the company with the opportunity
16 to have direct contact with customers to answer questions as well as distribute
17 information. The company is also able to provide application assistance for LIHEAP and
18 enroll customers into CRP onsite.
- 19 • Partnerships- PGW has developed partnerships with local city officials, low-income
20 advocates and other external stakeholders to increase awareness of the various resources.
21 Through these partnerships, PGW provides outreach materials as well as conduct
22 presentations to staff in order to increase awareness of the company's programs. The
23 company also attends various events held by partners in order to provide information and
24 enroll customers into assistance programs.
- 25 • Workshops/Presentations- Annually, PGW offers approximately 100 educational
26 workshops to its customers. These workshops include information on how to weatherize
27 their homes as well as provide attendees with kits and information packets about the
28 company's assistance programs. Each attendee also provides their contact information,
29 which allows PGW to add them to the appropriate direct contact campaign to receive
30 additional information regarding other resources that may be available to them.
31
- 32 • Brochures/Outreach Materials- PGW has a number of outreach materials explaining the
33 various programs available to its customers. These document and brochures are available
34 in five different languages, and is often distributed at various events and provided to local
35 partners.
36

1 IV. CONCLUSION

2 Q. DOES THAT COMPLETE YOUR REBUTTAL TESTIMONY?

3 A. Yes.