



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES

February 16, 2021

The Honorable Rosemary Chiavetta, Secretary
Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Re: Public Utility Service Termination Moratorium, Docket No. M-2020-301924

Dear Secretary Chiavetta:

The Department of Human Services (DHS) would like to provide comments to the Public Utility Commission's (PUC) Modification of the Emergency Order of March 13, 2020, regarding the Public Utility Service Termination Moratorium.

DHS administers the Low-Income Home Energy Assistance Program (LIHEAP) to assist eligible Pennsylvania households maintain home heating services. DHS appreciates PUC's efforts in extending the utility service moratorium in response to Governor Tom Wolf's Proclamation of Disaster Emergency, which identified the COVID-19 pandemic as a disaster emergency affecting the Commonwealth.

For the 2020-21 season, DHS has taken the extraordinary measure of temporarily expanding the LIHEAP Crisis definition during the pandemic for regulated utilities by classifying households as "in crisis" if they would normally be in danger of service termination if not for the extended moratorium. With this expanded definition, DHS has allowed regulated utilities to receive LIHEAP Crisis funds during the annual Winter Service Termination Moratorium despite being prohibited in previous years.

In response to the ongoing COVID-19 pandemic, DHS has adjusted its programs to respond to increased needs. Additionally, DHS will oversee the newly created Emergency Rental Assistance Program (ERAP), created through Act 1 of 2021, as well as the LIHEAP Recovery Crisis Program. The ERAP program, created by the Consolidated Appropriations Act of 2021, will allow counties to provide millions in rent and utility relief to renters across the state. The LIHEAP Crisis Recovery program from May until August of 2020, and additional LIHEAP resources from the Families First Coronavirus Response Act offered Crisis benefits to eligible utility consumers after the 2019-2020 LIHEAP season was closed.

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DHS recommends that the PUC continue the service moratorium for protected customers beyond the proposed March 31, 2021 moratorium termination date. This extension will allow DHS to better prepare and organize programs to assist with the expected high volume of utility terminations.

An extension of the service moratorium will help prevent consumers from losing utility services before the ERAP program is mobilized and initially opens for applications. DHS also anticipates that the federal government will provide additional LIHEAP funds. A relief bill containing \$4.5 billion in LIHEAP funds is expected to be approved by the United States House of Representatives. Pennsylvania would expect to receive approximately \$270 million in additional LIHEAP funding from this bill, which exceeds the annual LIHEAP allocation that Pennsylvania received. With these additional funds, LIHEAP could expand services to potentially include an additional program. An extension to the service moratorium by the PUC would give the opportunity for DHS to assist without a lapse in service for the utility customer.

Further, an extension of the service moratorium beyond the proposed March 31, 2021 date would support regulated utility companies, their customers, and the agencies responsible for administering assistance programs.

We appreciate the opportunity to comment on this PUC Emergency Order and look forward to continued communication with the PUC on this and other important issues impacting Pennsylvanians during this critical time.

Sincerely,



Teresa D. Miller
Secretary