



National Fuel[®]

Dominick A. Sisinni
Senior Counsel

February 15, 2024

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, Second Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

RE: Reply Comments of National Fuel Gas Distribution Corporation to Notice of Proposed Rulemaking Relative to Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (Regulations at 52 Pa. Code §§ 58.1 – 58.18) (the “Rulemaking”) Docket No. L-2016-2557886

Dear Secretary Chiavetta,

National Fuel Gas Distribution Corporation (“**National Fuel**” or “**Company**”) respectfully submits this letter in lieu of Reply Comments in the above referenced proceeding. National Fuel offers LIURP services to eligible customers, in compliance with its Commission-approved Universal Service and Energy Conservation Plan,¹ and thus is impacted by this rulemaking.

The Company filed initial comments in this proceeding on January 16, 2024. As a member of the Energy Association of Pennsylvania (“**EAP**”), National Fuel has participated in the preparation of EAP’s Reply Comments filed of even date herewith (“**EAP Reply Comments**”).

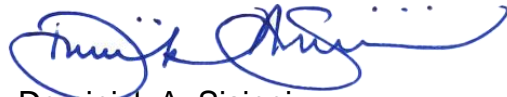
In lieu of repeating the well-reasoned positions espoused in the EAP Reply Comments, National Fuel hereby files this letter to express its support for the EAP Reply Comments.

Additionally, this letter is provided to stress National Fuel’s strong belief that any modifications to the LIURP regulations stemming from this rulemaking process must result in a regulatory scheme which: (a) remains focused on the longstanding goals of LIURP (and, in this regard, avoids ushering in changes which would transform LIURP into a sort-of panacea to alleviate all issues pertaining to safe and habitable housing in the Commonwealth); and (b) provides utilities with the flexibility and ability to meaningfully implement LIURP without introducing redundant, onerous reporting requirements, administrative complexities, and prescriptive program parameters with respect to same. Only in remaining true to the above considerations would LIURP provide a meaningful benefit to program participants without imposing unnecessary costs on ratepayers be achieved.

¹ See Plan at Docket No. M-2021-3024935.

Should you have any questions or comments, please do not hesitate to contact me at (814) 871-8177 or via e-mail at sisinnid@natfuel.com.

Very truly yours,



Dominick A. Sisinni

Enclosure

cc: Regina Carter – regincarte@pa.gov
Joseph Magee – jmagee@pa.gov
Louise Fink Smith, Esq. – finksmith@pa.gov
Erin Tate, Esq. – etate@pa.gov
Karen Thorne – kathorne@pa.gov; RA-PCLAW-LIURP@pa.gov; and
ra-pcpcregreview@pa.gov