



375 North Shore Drive
Pittsburgh, Pennsylvania 15212



Meagan Moore
Senior Attorney

Phone: 412-208-6527

Email: meagan.moore@peoples-gas.com

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VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – 2nd Floor
Harrisburg, PA 17120

Re: **L-2016-2557886 – LIURP NOPR**
Peoples Natural Gas Company LLC's Letter in Lieu of Comments

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC (“Company” or “Peoples”), please accept this letter for filing with the Pennsylvania Public Utility Commission, in lieu of reply comments the referenced proceeding.

With this letter, the Company provides its full support for the Reply Comments issued by the Energy Association (“EAP”) in this NOPR proceeding. Additionally, the Company wishes to emphasize two points raised by EAP in its Reply Comments:

1. First, on the matter of defining Energy Service Providers (“ESPs”) as only Community Based Organizations (“CBO”), the Company submits that it uses a non-CBO vendor due to a lack of qualified and available CBO vendors. As such, the Company emphasizes that it is important to maintain flexibility when defining an ESP and submits that it does not support limiting ESPs to only CBOs. Moreover, when it comes to Requests for Proposals (“RFPs”) seeking qualified vendors, a utility should be afforded the flexibility to include RFPs from both CBOs and non-CBOs, to ultimately choose the best vendor based on that vendor’s ability to provide services to the Company’s large service territory at reasonable costs.
2. Second, Peoples does not support the expansion of LIURP benefits to multi-family dwellings. The Company does not have the programming to implement these benefits to multi-family dwellings and posits that there are other programs that can better address multi-family weatherization efforts, as EAP notes in its Reply Comments.

If you have any questions or concerns, please reach out to me at (412) 208-6527 or Rita Black at (412) 208-6530.

Very truly yours,

Meagan Moore