

THE COMMUNITY ACTION PROGRAM CORPORATION  
OF WASHINGTON-MORGAN COUNTIES, OHIO

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DAVID E. BRIGHTBILL  
EXECUTIVE DIRECTOR

Columbia Gas Case # 21-0637-GA-AIR ,21-0638-GA-ALT, 21-0639-GA-UNC,21-640-GA-AAM

On Behalf of The Community Action Program Corporation of Washington-Morgan Counties, Ohio a Provider of Low-Income Energy Efficiency programs we respectfully ask that you do not approve the stipulation as filed. We currently serve members of our community who are carrying the heaviest energy burdens. This energy burden is reduced by the installation of weatherization and health and safety measures which benefit the client directly with quality-of-life improvement and reduction in energy bills.

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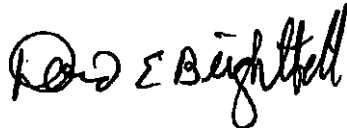
The stipulation as proposed would do the following.

- Diverts \$1.2 million to a bill assistance program. This is a band-aid rather than a cure. By installing weatherization measures to permanently fix the excessive gas usage the WarmChoice program stops the clients' heat from escaping the home. This saves the client money on their utility bill which can be spent in the local economy. Community Action administers LIHEAP funds and these funds are generally not fully expended. Furthermore, bill payment assistance money goes to the utility company and does not directly benefit the client as a long-term solution to energy burden.
- Diverting funds from WarmChoice to a bill assistance program and limiting the programs funds over the 5-year term will not allow WarmChoice providers to meet the demands and expenses of inflation.
- Limiting the weatherization services to one rental premise per property owner does not maximize the number of recipients of the program. The HWAP and other utility funded programs do not limit services to renters based on the property owner. This requirement will reduce the number of leveraged jobs which can be completed and has no bearing on saving energy or reducing the energy burden on the Columbia Gas customer. Low-income rentals generally remain low-income rentals thus the benefit of having efficient heating and lower energy bills continue even if the renter(s) who received the initial benefit moves from the residence. Landlords often own multiple residence which they rent to low-income families, limiting landlord participation only serves to reduce the number of low-income renters who can be served.
- Individuals the stipulation looks to prioritize such as disabled, and elderly should not, at the same time, be left behind by limiting the number of units per property owner.
- The Commission has routinely found these programs to provide benefits to customers. To curtail them now, at a time of historically high energy prices, will be a deterrent to the low-income individuals and families who would potentially receive future services.

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- The OCC's attempts to paint OPAC and its community action agency members as environmental groups is shameful. The Commission has routinely held OPAC to be a consumer advocate.

Thank you

A handwritten signature in black ink, appearing to read "David E. Brightbill". The signature is written in a cursive, somewhat stylized font.

David E. Brightbill  
Executive Director