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From: Nathan Keirns
To: Pucos Docketing
Subject: Case No. 21-639-GA-UNC
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I respectfully ask that you do not approve the Stipulation as filed. It would divert money from critical services needed to reduce energy consumption and increase health and safety. The energy burden that is lifted with the service of installing weatherization and health and safety measures benefits the client directly with quality of life and reduction in energy bills.

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 that can be spent in the local economy. The bill assistance program is duplication of services and unnecessary. Community Action administers LiHEAP funds and these funds are never fully expended as a result of client needs for bill assistance. 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 does not allow for Providers to meet the demands and expenses of inflation and cost of living.
- Limiting the weatherization services to one rental premise per property owner does not maximize the number of recipients of the program and is discriminatory of a population of low-income households. 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 that can be served and has no bearing on saving energy and reducing the burden of the Columbia Gas customer. Low-income rentals usually remain low-income rentals thus the benefit of having efficient heating and lower energy bills would continue even if the renter who received the initial benefit moved from the residence. This is an unnecessary administrative burden on the providers/contractors of the program that will create inefficiency and leave more customers unserved.
- Individuals the stipulation looks to prioritize such as disabled, and elderly should not at the same time be left behind by limiting the premises under a property owner.
- Clients receiving services are already well documented in eligibility, prioritized, and limited in spending by combining the services of leveraged energy efficiency programs. Providers have already worked over the years to streamline delivery costs and as non-profit Community Actions we are audited by multiple entities annually.
- 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 LITERALLY leave customers out in the cold.
- The OCC's attempts to paint OPAE and its community action agency members as environmental groups is shameful. The Commission has routinely held OPAE to be a consumer advocate and the Commission should understand that the OCC's involvement does not equate to a good deal for customers. OCC focuses on upfront costs alone, without considering long term benefits.

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Technician EC Date Processed 1/11/2023

Thank you,

Nathan Keirns

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