

# ***National Fuel***

**Anna Marie Cellino**

*President*

November 17, 2011

**VIA First Class Mail**

The Honorable Robert F. Powelson, Chairman  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: The Pennsylvania Public Utility Commission's  
2011 "Prepare Now" Campaign**

Dear Chairman Powelson:

Thank you for your November 3, 2011 letter stressing the importance of the Pennsylvania Public Utility Commission's (the "Commission") "Prepare Now" campaign. As stated in your letter, the nation's continuing economic situation will undoubtedly make this a difficult winter for many families.

As a natural gas utility serving the coldest region of Pennsylvania, and one hit hard by the economic downturn, National Fuel Gas Distribution Corporation ("National Fuel") agrees that the 2011 "Prepare Now" campaign should focus on increasing customer awareness of winter heating costs, educating customers about the availability of low-income programs and budget billing; and safe home heating. Such outreach is important this year since, due to the continuing economic downturn, many customers find themselves eligible for assistance for the first time. Thus, National Fuel has expended extra effort this fall in educating customers regarding the availability of various assistance programs. For instance, this fall, in conjunction with the Cold Weather Survey activities, National Fuel will be delivering additional information regarding LIHEAP.

Specifically, and in response to the numbered items in your letter, National Fuel has or will undertake the following actions for the 2011-2012 heating season:

1. National Fuel takes every opportunity to educate customers about available assistance programs, including Customer Assistance Program ("CAP"), LIHEAP, and hardship funds and assisting them to access and retain benefits.
2. National Fuel's CAP continues to have no limit on customer enrollment and, as such, we make an effort to refer any low-income customer to our CAP representatives when they call to make payment arrangements. National Fuel

believes its CAP is one of the best in the state and makes every effort to enroll low-income customers, including those facing termination.

3. We will continue to aggressively promote our Neighbor For Neighbor Heat Fund. All customers, regardless of the method of payment, are able to make contributions to the fund. The program continues to be open and available to all of our older customers experiencing a difficult situation.

4. It has been, and will continue to be, our practice to restore service to any low-income customers enrolling in our CAP for the first time.

5. In customary cold weather periods, we view termination of low-income customers as a last resort and take every step to attempt to allow customers who are making a good faith effort to pay to keep utility service. In addition, the availability of various hardship funds provides customers who are experiencing difficulties due to the economic downturn, a great opportunity to avoid termination.

6. National Fuel will continue its practices of: (1) waiving security deposits for low-income customers and; and (2) where appropriate, adding a reconnection fee to a customer's bill rather than making it a condition of restoring service.

7. We will accept any appropriate combination of LIHEAP, CRISIS and Neighbor For Neighbor funds to turn on or reconnect service. If these funds are insufficient and a customer payment is also required, we will be reasonably lenient considering all appropriate circumstances.

8. We will continue to consider the application of LIHEAP, CRISIS and Neighbor For Neighbor grants when establishing a payment arrangement for low-income customers. The Company will continue to negotiate payment arrangements with each individual according to their ability to pay.

9. National Fuel annually provides a fall bill insert to all customers containing information regarding home heating safety. In addition, in November, we will be running a newspaper feature regarding the dangers of carbon monoxide and other safety issues. Further, National Fuel's Low Income Usage Reduction Program ("LIURP") includes a component for furnace replacement or repair. Company representatives will continue to make referrals to other agencies for repair/replacement services.

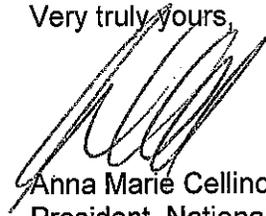
10. We have and will continue to aggressively promote the use of our budget billing and third party notice programs which have always allowed for year-round enrollment.

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11. National Fuel provides information on all programs and services through use of mass media campaigns in multiple formats designed to reach all audiences. National Fuel continues to promote LIURP and assists customers in obtaining information on the program. The Company also coordinates benefits among other providers.

Again, thank you for the Commission's efforts in educating all Pennsylvanians on how to best prepare for increased winter energy costs. If you need any additional information please feel free to contact me.

Very truly yours,



Anna Marie Cellino  
President, National Fuel Gas  
Distribution Corporation

AMC:ljt

cc: Vice Chairman John F. Coleman, Jr.  
Commissioner James H. Cawley  
Commissioner Wayne E. Gardner  
Commissioner Pamela A. Witmer