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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al. :
v. : Docket No. R-2015-2518438
UGI Utilities, Inc. – Gas Division :

DIRECT TESTIMONY OF MITCHELL MILLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

April 12, 2016

PUBLIC VERSION

CONFIDENTIAL INFORMATION REDACTED

1 **PREPARED DIRECT TESTIMONY OF MITCHELL MILLER**

2 **Q: Please state your name, occupation and business address.**

3 A: Mitchell Miller. I currently provide consulting services regarding utility programs that
4 promote the public interest with a focus on low income households. My address is 60 Geisel
5 Road, Harrisburg, PA 17112.

6 **Q: Briefly outline your education and professional background.**

7 A: As my attached resume shows, I received my B.S. Degree in Community Development
8 from Pennsylvania State University, where I graduated *cum laude* in 1974, and a M.A degree in
9 Public Administration from Shippensburg University in 1984. I have over 35 years of
10 experience in the development, implementation, and evaluation of program design for residential
11 utility consumers. The focus of my work has concerned education, energy efficiency, credit and
12 collections, and customer assistance programs.

13 After serving as a research analyst at both the Pennsylvania Governor's Action Center
14 and the Pennsylvania Public Utility Commission ("Commission"), I was appointed Chief of the
15 Commission's Division of Research and Planning in 1978 and, in 1992, I was designated as the
16 Director of the Bureau of Consumer Services, where I served until my retirement from the
17 Commission in 2009.

18 Following my retirement from the Commission in 2009, I served for over three years as a
19 consultant to the Pennsylvania Department of Community and Economic Development
20 ("DCED") on weatherization and energy efficiency for the Pennsylvania Weatherization
21 Assistance Program (WAP). My resume is attached as Appendix A.

1 **Q: Please describe the focus of your work over the past thirty-five years.**

2 A: During my tenure at the Commission, I was primarily engaged in activities relating to
3 regulatory policy involving residential customer service, complaint handling, credit and
4 collections, and universal service, including customer assistance programs and low-income
5 energy efficiency and conservation. The Bureau of Consumer Services has regulatory authority
6 and responsibility for policy development for all areas of consumer services including resolving
7 consumer complaints and problems, enforcing consumer regulations, developing, implementing
8 and evaluating programs involving complaint handling, complaint analysis, collections,
9 enforcement of consumer regulations, utility customer assistance programs and low income
10 conservation. My focus at DCED was the creation of a performance-based Weatherization
11 Assistance Program system, dedicated to a high standard of quality, compliance and production.

12 **Q: What is your relevant experience on issues of low-income utility affordability?**

13 A: During my tenure, the Commission emerged as a national leader in research,
14 development, and oversight of programs addressing credit and collection issues affecting low-
15 income utility consumers. I was responsible for evaluating utility and Commission customer
16 service programs, identifying problems and making recommendations for change. These
17 activities led to the recognition of the need for development of integrated programs for low
18 income consumers. As director of BCS, I was responsible for the development, oversight, and
19 monitoring of the initial pilot and then the statutorily required low-income Universal Service
20 Programs. Each of these programs is structured to provide a different form of assistance to low-
21 income customers to enable those customers to afford and maintain basic service. For example,
22 the Customer Assistance Program (CAP) provides alternatives to traditional collection methods
23 for low income, payment troubled utility customers, and the Low Income Usage Reduction

1 Program (“LIURP”) is a targeted weatherization program designed to assist low-income
2 households with the highest energy consumption, payment problems, and arrearages. These
3 programs work in tandem and are designed to assist low-income households have affordable
4 utility services and safe living environments while reducing utility collection and therefore
5 benefitting other ratepayers.

6 As director of BCS, I supervised the review and determination of thousands of low-income
7 consumer complaints and inquiries as well as the reviews of utility performance at handling these
8 customer complaints and payment arrangement requests.

9 I directed the creation, development, and evaluation of the expansion and the
10 effectiveness of the Universal Service Programs in Pennsylvania that are targeted toward low-
11 income households. These programs included CAP and LIURP, as well as the Customer
12 Assistance Referral Evaluation program (CARES) and utility-funded hardship funds. In
13 addition, the passage of the Electricity Generation and the Natural Gas Customer Choice and
14 Competition Acts required that the Commission ensure that universal service and energy
15 conservation services are appropriately funded and available in each utility distribution territory.
16 The Bureau of Consumer Services was responsible for Commission oversight of these programs
17 since their inception.

18 Further, upon my retirement from the Commission, I served as a consultant on
19 weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program
20 (WAP) at DCED. I was instrumental in transforming the WAP program by creating a
21 performance-based system, dedicated to a high standard of quality, compliance and production.
22 Innovations included introducing performance standards for production, quality and compliance
23 and independent state certification and training for all state WAP workers. I was also responsible

1 for coordinating DCED’s WAP program with the Commission’s LIURP and Act 129 low-income
2 programs. Currently, I am also under contract as a policy consultant for the Philadelphia Water
3 Department. The contract is to provide consulting services that will lead to the improvement to
4 the informal dispute and hearing process, and the development of deferred payment agreements.

5 I have participated at the National Association of Regulatory Utility Commissioners
6 (“NARUC”), the National Low Income Energy Consortium and the National Energy Utility
7 Affordability Conference meetings and have presented numerous sessions related to low-income
8 utility affordability. I current serve on the board of directors of the Keystone Energy Efficiency
9 Alliance (“KEEA”) and as a co-chair of the KEEA annual conferences. I am also a member of the
10 WAP Policy Advisory Council.

11 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

12 **A:** Yes. I have submitted testimony in a number of proceedings before the PUC. Below is a
13 list of the proceedings in which I presented testimony, in reverse chronological order.

- 14 • Petition of Duquesne Light for Approval its Act 129 Phase III Energy Efficiency and
15 Conservation Plan, Docket No. M-2015-2515375
- 16 • Petition of PECO Energy Co. for Approval its Act 129 Phase III Energy Efficiency and
17 Conservation Plan, Docket No. M-2015-2515619
- 18 • Consolidated Petition of First Energy Companies for Approval its Act 129 Phase III
19 Energy Efficiency and Conservation Plan, Docket Nos. M-2015-2514767, -2514768, -
20 2514769, 2514772
- 21 • Petition of Philadelphia Gas Works for Approval of its Phase II Demand Side
22 Management Plan, Docket No. P-2014-2459362
- 23 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2015-2468056
- 24 • Pa. PUC v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275
- 25 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2014-2406274
- 26 • Verizon Pa., LLC, and Verizon North, LLC, Petition for Competitive Classification,
27 Docket Nos. P-2014-2446303, P-2014-2446304
- 28 • Petition of PECO Energy Co. for Approval its Act 129 Phase II Energy Efficiency and
29 Conservation Plan, Docket No. M-2012-2333992

- 1 • Petition of PECO Energy Co. for Approval of its Default Service Program II, Docket No.
2 P-2012-2283641
3 • Petition of PECO Energy Co. for Approval of its Universal Service and Energy
4 Conservation Plan, Docket No. M-2012-2290911.
5

6 **Q: Have you provided litigation support for the Commission?**

7 A: I did not testify in any proceeding during my tenure at the Commission. However, I directed
8 the Bureau's activities in policy development, as well as enforcement litigation to ensure
9 compliance with customer service regulations and statutes.

10 **Q: For whom are you testifying in this proceeding?**

11 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
12 Efficiency in Pennsylvania ("CAUSE-PA").

13 **Q: What is the purpose of your testimony?**

14 A: CAUSE-PA intervened in this proceeding to ensure that UGI Utilities Inc., Gas Division's
15 (UGI or the Company) proposed rate increase – as well as the policies, procedures and practices
16 for the provision of service – will not adversely affect UGI's low-income customers' ability to
17 connect to, maintain, and afford natural gas service, which is essential for home heating, water
18 heating, and cooking.

19 In my testimony, I will explain the effect that UGI's proposed 19.7% increase in the
20 Residential Customer Charge will have on the ability for a low-income household to afford natural
21 gas service. I will also discuss UGI's proposal to recover an increased portion of the residential
22 cost of service through a fixed charge, as opposed to the volumetric charge. As I will explain,
23 recovery of customer costs through a fixed charge is unduly discriminatory and uniquely harmful
24 to low income households.

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1 In addition to addressing the overall impact of a rate increase and the rate design on low
2 income families, I will discuss several troubling aspects of UGI’s service delivery which further
3 complicate the ability of low income customers to connect with and maintain natural gas service.
4 I will offer recommendations for improving policies and procedures and to mitigate the further
5 harm to low-income customers that is certain to result from UGI’s proposed rate increase and
6 design which, as presently proposed, would stunt the ability of this vulnerable customer population
7 to access service.

8 My testimony is in addition and complimentary to the testimony of CAUSE-PA’s other
9 two witnesses: Ms. Marielle Macher, Esquire, who addresses UGI’s language access policies and
10 its service to customers with limited English proficiency (CAUSE-PA ST 2); and Ms. Judith
11 Lewis, Esquire, who addresses UGI’s policies and practices for serving customers who are victims
12 of domestic violence (CAUSE-PA Statement 3). Taken together, these three pieces of testimony
13 address aspects of UGI’s deficiencies regarding its services for economically and otherwise
14 vulnerable customers.

15 **Q: What changes does UGI propose for its residential rate class?**

16 A: In relevant part, UGI proposes to increase its overall residential rate approximately 19%.
17 Specifically, this translates to an average customer bill increase of \$10.20 per month from \$51.77
18 to \$61.97.¹ Looking only at the distribution service, UGI’s proposed increase in residential
19 distribution rates is almost 40%. UGI proposes to actualize this increase by more than doubling
20 its fixed customer charger from \$8.55 to \$17.50 per month, and by changing its current declining
21 block structure for volumetric rates to a single block volumetric charge of \$3.0123 per Mcf.²

¹ UGI Notice of Proposed Rate Change.

² UGI Stmt. 6, Lahoff, at 22-23.

1 In my view, the increase as a whole, and specifically UGI's decision to shift a significant
2 part of the increase to a fixed customer charge, will have a devastating effect on the ability of
3 UGI's low-income customers to maintain service, and will be particularly difficult for the vast
4 majority of low-income customers: those who are not enrolled in UGI's Customer Assistance
5 Program (CAP).

6 **Q: Why are you focusing more closely on low income households not enrolled in CAP?**

7 A: I am distinguishing between CAP and non-CAP low income customers – and focusing
8 more closely on the latter – because non-CAP low income customers will suffer an immediate
9 and significant economic harm as a result of the proposed increase. This is the case because
10 UGI's CAP rate is calculated based on a percentage of the customer's income or the customer's
11 budget bill, whichever is lower. The rate impact will, thus, not be directly felt by CAP-enrolled
12 customers, to the extent they remain in the program.³

³ See Revised Universal Service and Energy Conservation Plan for the Four Year Period January 1, 2014 through December 31, 2017, Docket No. M-2013-2371824, at 11 (Amended Pursuant to the Final Order Entered January 15, 2015) (hereinafter UGI 2014-2017 USECP).

1 **Q: How many non-CAP, low-income customers live within UGI's service territory?**

2 A: UGI has 84,809 estimated low income households, and 35,100 confirmed low-income
3 customers, yet only 7,966 are enrolled in CAP. ⁴ In other words, between 77 and 91% of UGI's
4 low income customers are not enrolled in CAP and therefore pay full tariff rates.

5 **Q: Why aren't all low income customers enrolled in CAP?**

6 A: There are a lot of reasons why a customer may not be enrolled in CAP. As a simple
7 matter, many low income consumers are not aware of or informed about the benefits available
8 through CAP or are not referred to CAP in a manner which allows the customer to understand
9 the terms and enroll in the program. Other low income customers are aware of the program and
10 the benefits – but are subject to a year-long stay-out for having voluntarily withdrawn from the
11 program.⁵ Still others may know about and be interested in the program, but may face barriers

⁴ As of March 2, 2016, UGI had a total CAP enrollment of 7,966, compared to 84,809 estimated and 35,100 confirmed UGI customer households with income at or below 150% of the Federal Poverty Guidelines. Appendix B (Responses of UGI to CAUSE-PA I-4, I-5, and I-6 and respective attachments I-4-1, I-5-1, and I-6-1).

⁵ UGI USECP at 13-14. The policy, and resulting impact of this 12-month stay-out provision was highlighted in a recent article published in the Patriot News. The article follows the path of one UGI customer through periods of extreme economic hardship, explaining the cause of the household leaving CAP and the effect of the stay-out provision in exacerbating the customer's hardship:

But in April of last year, Douglass made a mistake that would eclipse any of his previous indiscretions with UGI.

That month, according to Douglass, his monthly usage had fallen to only \$40 – significantly less than the fixed \$127 he was supposed to pay as part of UGI's customer assistance program. Douglass said that he believed this meant he was supposed to call UGI and ask to be removed from the program until his monthly bills exceeded \$127 again.

But the next month, Douglass discovered that by exiting the program he had inadvertently broken his plan to pay the debt he owed to the company – Douglass said the company wanted the entirety of the \$2,351 that he owed it.

Daniel Simmons-Ritchie, *How a Controversial Law Left a Harrisburg Family in the Cold*, The Patriot News / PennLive (Feb. 25, 2016), available at http://www.pennlive.com/news/2016/02/how_a_controversial_law_left_a.html.

1 such as the inability to produce identification documents,⁶ read or write, or - when an in-person
2 application is required - to secure time off work, childcare, and transportation.⁷

3 While some of these issues are consistent across utility service territories, UGI's CAP
4 enrollment is, and has historically been, much lower than the average CAP enrollment of other
5 Natural Gas Distribution Companies (NGDCs). To me, UGI's uniquely low CAP rate signals
6 that its internal policies and procedures are to blame for UGI's CAP under-enrollment. The
7 following table compares UGI's CAP enrollment rate with the weighted NGDC average over the
8 last 10 years:

9 **TABLE 1: CAP Participation Rate – UGI Gas Compared to NGDC Average⁸**

CAP Participation Rate	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	21%	29%	29%	27%	24%	21%	17%	13%	11%	18%
Weighted NGDC Average	38%	44%	42%	43%	40%	41%	40%	37%	36%	37%

10

11 Despite this, UGI is not proposing to adopt any changes to its universal service programs to
12 offset the financial hardship that will result from its proposal to raise residential rates nearly
13 20%.

⁶ See CAUSE-PA Statement 2, Marielle Macher.

⁷ At the public input hearing on March 31, 2016, at 1:00pm, Ms. Kay Pickering – a volunteer at the Harrisburg Center for Peace & Justice – testified that many of these barriers keep her clients from accessing the program, even if they want to apply.

⁸ Table compiled from the following BCS reports: Report on 2014 Universal Service Programs & Collections Performance, at 42; Report on 2013 Universal Service Programs & Collections Performance, at 37; Report on 2011 Universal Service Programs & Collections Performance, at 40; Report on 2009 Universal Service Programs & Collections Performance, at 39; Report on 2007 Universal Service Programs & Collections Performance, at 39, available at http://www.puc.pa.gov/filing_resources/universal_service_reports.aspx. Note that percentages were rounded to the nearest whole number.

1 **Q: How would UGI's proposed rate increase impact low income households not**
2 **enrolled in CAP?**

3 A: The proposed rate increase would have a significant detrimental impact on the ability of
4 low income households not enrolled in CAP to connect to, maintain, and afford UGI's natural gas
5 service. Rate accessibility and affordability are critical components to utility regulation and rate
6 design, as these concepts are part and parcel to the imposition of just and reasonable rates.

7 In determining rate affordability, it is helpful to look at average energy burdens, or the
8 percentage income a household pays for home energy costs. A residential ratepayer with a
9 moderate household income of \$50,000 or more pays an average of just 3% of their after-tax
10 income on home energy costs.⁹ In comparison, UGI's CAP targets affordability at 7% of income
11 for households between 0-50% FPL; 8% of income for households between 51-100% FPL; and
12 9% of income for households between 101-150% FPL.¹⁰ Although the program plays a critically
13 important role in reducing the energy burdens of the most economically vulnerable populations,
14 UGI's required CAP payments, set at double or triple the energy burden level of a household with
15 a net income of \$50,000, does not result in bringing low income customers into full parity with
16 average residential energy burdens.

17 But again, between 77 and 91% of low income customers in UGI's service territory are not
18 enrolled in CAP, and are unable to reduce their energy burdens to even that of CAP participants,

⁹ Diana Hernandez, *Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change*, 103(4) Am. J. Pub. Health (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

¹⁰ UGI 2014-2017 USECP at 15; see also 52 Pa. Code § 69.261. The CAP Policy Statement provides that – to reach affordability – gas heating should cost no more than 5-8% of income for a household at between 0 and 50% of poverty; 7-10% of income for a household between 50 and 100% of poverty; and 9-10% of income for a household between 101-150% of poverty. 52 Pa. Code § 69.265. The combined cost to a low-income customer for both gas heating and electric nonheating should not cost no more than 7-13% of income for those at 0-50% of poverty; 11-16% of income for those at 50-100% of poverty; and 15-17% for those at 101-150% of poverty. *Id.*

1 let alone middle income households. Compared to both average residential customers and low
2 income CAP customers, low-income customers who are not enrolled in CAP have significantly
3 higher energy burdens. The National Low Income Energy Consortium (NLIEC) conducted a
4 survey designed to capture a nationally representative picture of the issues facing low income
5 households.¹¹ The study found that “households with incomes below 50% of the federal poverty
6 level pay a staggering 38% or more of their annual income for their home energy bills.”¹²

7 The overwhelming energy burden on low income households makes it difficult for these
8 customers to pay for other basic necessities such as housing, food, and medicine; can threaten
9 stable and continued employment and education; and can create serious public safety risks.¹³ Of
10 the households surveyed in the NLIEC study, 46% went without food and 45% failed to take
11 medication as prescribed by doctors in order to pay their home energy bills.¹⁴ An alarming 54%
12 reported using an oven for space heating.

13 **Q: Is the threat of increased termination for low income households significant?**

14 A: Yes, very significant. Low income customers have a considerably higher rate of
15 involuntary, payment-based termination compared to average residential customers. In 2014,
16 UGI’s confirmed low-income customers were terminated by UGI at a rate of 19.3%, compared to

¹¹ Nat’l Low Income Energy Consortium, *Paid but Unaffordable: The Consequences of Energy Poverty in Missouri – and Elsewhere*, at 2-5 (2004), available at http://www.neuac.org/2004_MO%20Overview.pdf.

¹² *Id.*; see also Diana Hernandez, *Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change*, 103(4) *Am. J. Pub. Health* (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20> (explaining that households with an annual income of \$10,000 pay approximately 33% of their after-tax income on energy costs).

¹³ Nat’l Low Income Energy Consortium, *Paid but Unaffordable: The Consequences of Energy Poverty in Missouri – and Elsewhere*, at 2-5 (2004), available at http://www.neuac.org/2004_MO%20Overview.pdf.

¹⁴ *Id.*

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1 3.4% for all residential customers.¹⁵ This includes both CAP and non-CAP confirmed Low
2 Income customers. Confirmed non-CAP customers are terminated at an even higher rate. In 2015,
3 CAP customers were terminated a rate of 16%, while non-CAP confirmed low income customers
4 were terminated at a rate of 22%.¹⁶ At the same time, terminations are on the rise in UGI's service
5 territory: confirmed low income termination rates rose 18.4% from 2012 to 2014.¹⁷

6 Evidence further suggests that low income customers are often unable to reconnect to
7 natural gas service, and may go for extensive periods of time before restoration is possible. In
8 2014, UGI terminated 8,018 confirmed low income customers, but less than half were reconnected
9 – just 3,242.¹⁸ In fact every year, termination numbers far surpass reconnection numbers, signaling
10 that more and more customers are going without central heating systems, cook-tops, and other
11 essential components of a healthy and safe home. When unable to use their primary heating
12 system, families often resort to dangerous, high usage / high cost heating methods – such as electric
13 space-heaters, electric stoves, and/or portable generators – which increases the risk of carbon

¹⁵ Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 12-13 (2015), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf.

¹⁶ Appendix B (Responses of UGI to CAUSE-PA I-16 & I-18).

¹⁷ Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 12-13 (2015), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf.

¹⁸ Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 11, 14 (2014), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2013.pdf.

1 monoxide poisoning and house fires.¹⁹ Loss of the ability to heat, cook, and access hot water is
2 also a common catalyst to homelessness, especially for families with children.²⁰

3 Table 2 below shows that, over the last decade, UGI's low income termination rates have
4 consistently and significantly outpaced the average NGDC termination rate, yet – with the
5 exception of just one year - UGI's reconnections have been, consistently and significantly lower
6 than industry average.

¹⁹ “Space heaters accounted for 33% of 2007-2011 reported home heating fires, 81% of home heating fire civilian deaths, 70% of home heating fire civilian injuries, and 51% of home heating fire direct property damage.” Nat’l Fire Protection Ass’n, Fire Analysis & Research Division, *Home Fires Involving Heating Equipment*, at ix & 33 (Oct. 2013). While there are no state-wide statistics on space heater-related fires in Pennsylvania, we can see that the national statistics are on par with statewide statistics by looking to the local news carriers, which regularly report on space-heater related fires, injuries, and deaths.

²⁰ In a report issued April, 2016 by the Joint State Government Commission, utility assistance ranked in the top three types of assistance noted by survey respondents (24.1 percent) that would have prevented homelessness. Joint State Government Commission, *Homelessness in Pennsylvania: Causes, Impacts, and Solutions*, at 112, 157, 160 (April 2016), available at http://jsg.legis.state.pa.us/publications.cfm?JSPU_PUBLN_ID=447 (“When asked if there were any services that may have prevented them from becoming homeless, the women responded overwhelmingly that assistance with past-due rent and utilities, security deposit, and first and last months’ rent would have been most beneficial.”); see also Roger D. Colton, *Prepayment Utility Meters, Affordable Home Energy, and the Low Income Utility Consumer*, ABA J. Affordable Housing & Community Development (2001). As explained by Mr. Colton,

Home energy costs invariably affect the availability of housing as well. There is, for example, a documented relationship between utility disconnection and homelessness. Research in Philadelphia has found that “the relationship between terminations and homelessness is ... clearly discernible.” Surveys of homeless persons and emergency shelter providers across Pennsylvania “have found the loss of utility service to be a minor, but consistent contributor to homelessness. Among the dominant housing-related reasons for homelessness, utility terminations were cited as the cause 7.9% of the time.” High energy prices “also undoubtedly contribute to the other, more frequently cited reasons for homelessness, such as ‘lack of housing in income range,’ and ‘eviction for nonpayment.’”

Id. (internal citations omitted).

1 TABLE 2: Confirmed Low Income Terminations & Reconnections²¹

Confirmed LI Termination Rate	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	32%	21%	30%	30%	26%	21%	21%	16%	17%	19%
NGDC Average	12%	12%	13%	17%	14%	13%	12%	12%	12%	13%

Confirmed LI Reconnection Rate	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	52%	18%	69%	64%	55%	57%	42%	47%	48%	47%
NGDC Average	72%	56%	58%	63%	64%	65%	62%	67%	67%	65%

2
3 In other words, UGI’s low income customers are more likely to be terminated and less likely to be
4 reconnected than low income natural gas customers who reside elsewhere in the state. The
5 average length of termination for UGI’s low income customers ranges from 45 days for CAP
6 customers to 50 days for non-CAP confirmed low income customers.²² Though, as the low
7 reconnection rates above indicate, we simply do not know how many households are terminated
8 for a significantly longer period of time.²³

²¹ Table compiled from the following BCS reports: Report on 2014 Universal Service Programs & Collections Performance, at 13,15; Report on 2011 Universal Service Programs & Collections Performance, at 12; Report on 2010 Universal Service Programs & Collections Performance, at 12; Report on 2009 Universal Service Programs & Collections Performance, at 12; Report on 2008 Universal Service Programs & Collections Performance, at 10; Report on 2007 Universal Service Programs & Collections Performance, at 10; Report on 2006 Universal Service Programs & Collections Performance, at 10; Report on 2005 Universal Service Programs & Collections Performance, at 10. These reports are all available at http://www.puc.pa.gov/filing_resources/universal_service_reports.aspx. Note that percentages were rounded to the nearest whole number.

²² Appendix B (Responses of UGI to CAUSE-PA I-16, I-17, I-18, and I-19).

²³ At the public input hearing on March 31, 2016, at 1:00pm, Ms. Kay Pickering, a volunteer at Harrisburg Center for Peace & Justice, testified that many of the UGI customers she assists spend months without natural gas service:

1 Low income customers – particularly those not enrolled in CAP - are already subject to
2 regular and lengthy termination. If cost of service increases without critical changes to UGI’s
3 policies and practices, UGI’s vulnerable low income customers will experience a continued and
4 escalated rise in the rate of termination.

5 **Q: Does LIHEAP mitigate the harm of the proposed rate increase on non-CAP low**
6 **income households?**

7 A: No. Relative to need, there are – proportionately - very few UGI customers that receive
8 LIHEAP assistance. As of March 1, 2016, UGI collected a total of 7,699 LIHEAP cash grants
9 on behalf of low income customers.²⁴ Of the grants received, 2,469 were received on behalf of
10 CAP customers, and 5,230 were received on behalf of non-CAP customers.²⁵ While LIHEAP is
11 a critically important program and provides life-sustaining assistance to those in need, the Cash
12 grant is intended to provide only supplemental assistance and it is not enough to mitigate the
13 financial harm that will be felt by the approximately 75,000 low income households affected by
14 the rate increase. Indeed, if the rate increase were approved as proposed, the average residential
15 bill would increase by nearly the same amount as the average LIHEAP cash grant,²⁶ essentially
16 eclipsing the entire benefit received by low income customers through the LIHEAP program.

17 **RATE DESIGN**

Mia and her family have been without gas heat for two years. ... Lisa is disabled, uses a walker and has been without gas for about 10 months. ... Tyisha has 4 children and has not been able to get her gas turned on because she could not pay the back bills she accumulated when she lived at 3 previous residence.

Prepared Written Testimony of Kay Pickering (March 31, 2016).

²⁴ Appendix B (Response of UGI to CAUSE-PA I-7 and attachment).

²⁵ Appendix B (Response of UGI to CAUSE-PA I-8).

²⁶ See *Energy Assistance Summary (EASUM)* prepared by the Pennsylvania Department of Human Services for the period of 9/27/15 through 3/31/16, which shows that statewide, for the 15-16 LIHEAP year, the average cash grant for gas heating customers was \$192 and the average overall cash grant was \$147. This EASUM is attached hereto as Appendix C.

1 **Q: How would UGI's proposed rate design impact low income households?**

2 **A:** UGI is proposing to recover an increased portion of its costs through the fixed residential
3 customer charge – from its current rate of \$8.55 to a proposed rate of \$17.50.²⁷ Increased fixed
4 charges are exceptionally harmful to low-income customers, and should not be approved.

5 Increasing the costs recovered through a fixed charge – as opposed to a volumetric charge
6 – undermines the ability for customers to reduce bills through conservation and consumption
7 reduction. Reducing the ability to decrease bills through conservation while at the same time
8 increasing the amount paid through the fixed charge is particularly problematic for low-income
9 customers, given that low income households have significantly less budget elasticity than higher
10 income households. Furthermore, increasing the fixed charge that a residential customer must
11 pay, without any link to a customer's usage, also undermines the goals of the Low Income Usage
12 Reduction Program (LIURP) -- which is specifically designed to lower consumption and increase
13 energy affordability for low income customers.

14 On June 10, 2015, The National Association of State Utility Consumer Advocates
15 (NASUCA) passed a resolution opposing efforts to increase fixed customer charges for
16 distribution services.²⁸ In the resolution, NASUCA explains that “low-income customers (with
17 incomes at or below 150% of the federal poverty level) on average use less [energy] than the
18 statewide residential average and less than their higher-income counterparts.”²⁹ NASUCA notes
19 that elderly and minority customers, who are disproportionately low income,³⁰ also use less

²⁷ UGI Statement 6, Lahoff, at 23.

²⁸ Nat'l Ass'n of State Utility Consumer Advocates, Customer Charge Resolution, 2015-1 (June 10, 2015)

²⁹ *Id.*

³⁰ Pathways PA, *Overlooked and Undercounted: How the Great Recession Impacted Household Self-Sufficiency in Pennsylvania* (Oct. 2012) (“While the majority of families with inadequate income in Pennsylvania are White, people or color are disproportionately likely to have inadequate incomes, particularly Latinos and African

1 energy on average than their younger and Caucasian counterparts, respectively. By imposing a
2 higher fixed charge, low income elderly and minority populations will suffer the largest, most
3 detrimental economic impact – and will simultaneously lose the ability to offset unaffordable
4 costs by participating in energy efficiency and/or conservation programming.

5 **Q: Proponents of a higher fixed charge argue that the pricing structure is beneficial to**
6 **customers because the rates are easier to understand and provide enhanced predictability.**

7 **How do you respond?**

8 A: It is true that shifting cost recovery from a variable, volumetric-based rate to a fixed
9 charge will produce bills which are easier to understand and are more predictable. But a simple,
10 predictable bill only provides low income customers with a meaningful benefit if it also produces
11 an affordable bill. A change which results in a bill that is predictable and easily understood, but
12 at the same time increases costs to a low-income household, produces a negative result.

13 For CAP customers, with bills structured and intended to be fixed at an affordable level,
14 stability and predictability can serve as meaningful budgeting tools. However, for low-income
15 customers who are not enrolled in CAP, bill stability of an already unaffordable bill will not, by
16 virtue of stability alone, provide a benefit to the customer.

17 A shift to a higher fixed customer charge will significantly reduce the ability to have
18 appreciable bill savings through energy efficiency and conservation. For poor households, this
19 matters. As I described above, poor households struggle on a monthly basis to pay all of their
20 bills, often choosing to forego food or medicine in order to keep service connected.

Americans. ... Since the Great Recession, the proportion of households with inadequate income has increased the most for race / ethnic groups of color.”).

1 **Q. Proponents of a higher fixed charge also argue that a fixed fee is appropriate**
2 **because the Company's costs are mostly fixed. Do you agree?**

3 No. Charging the same flat fixed rate for distribution service inequitably assigns
4 distribution costs on low usage customers, who are often those least able to afford the cost of
5 energy, without any corresponding benefit or service enhancement. In turn, as mentioned above,
6 fixed customer charges undermine the overarching policy goal of decreasing energy
7 consumption through targeted energy efficiency and conservation programming.

8 A higher fixed charge would place the highest financial burden on low income customers,
9 who often reside in small multifamily units with fewer square feet to accomplish effective
10 consumption reduction, and who have an inelastic budget which is unable to absorb an increase
11 in fixed fees.³¹ While energy efficiency and weatherization measures to reduce usage are free for

³¹ "Multifamily housing, generally defined as residential buildings with 5 or more units, is an important part of America's low income housing supply. It houses about a quarter (27.3%) of all households with incomes below the poverty line, 28.4% of all very low income families and nearly half (48.9%) of all very low income renters." Gary Pivo, Energy Efficiency and its Relationship to Household Income in Multifamily Rental Housing (Sep. 2012), https://www.fanniemae.com/content/fact_sheet/energy-efficiency-rental-housing.pdf.

According to the most recent data from the United States Department of Energy, low income households in the Northeast region use less natural gas per square foot than households with higher incomes. US DOE, Residential Energy Consumption Survey, T. CE2.2, <https://www.eia.gov/consumption/residential/data/2009/index.cfm?view=consumption>.

See also Appendix D, Roger Colton, Home Energy Consumption Expenditures by Income (Pennsylvania) (May 2009).

The data showing a direct relationship between income and home energy consumption in Pennsylvania is compelling. The differences that are evident in the data are not small. Low income customers have lower usage not only as compared to high-income customers, but also when compared to average customers as well. In addition, the national data is consistent. The national data developed by the U.S. DOE, the regional data developed by the U.S. DOL, and the state-specific data developed by the Census Bureau all find the same relationship. Finally, the data is internally consistent. While DOE reports that income is related to home energy usage because of differences in housing unit sizes, that relationship is confirmed when housing unit size is overlaid on income and home energy expenditures in the Pennsylvania using state-specific data.

Id. at 8.

1 a very small portion of this population through LIURP programming, the measures installed will
2 be less effective at achieving additional savings for this population if fixed service charges
3 increase.

4 **Q: Do you have any recommendations that could help mitigate the disproportionate**
5 **impact of UGI's rate design on low-income households?**

6 A: Yes. For the reasons explained above, I recommend that if any increase in the residential
7 rate is approved, that increase should be applied to the volumetric charge. I also recommend that
8 UGI expand and significantly improve its universal service programming to mitigate the harm to
9 this vulnerable population of any increased charges.

10 **UNIVERSAL SERVICE PROGRAMS**

11 **Q: UGI Witness Robert Stoyko explained in direct testimony that "UGI is not**
12 **proposing any changes to any of its Commission-approved universal service programs."**
13 **UGI Statement 7 at 10. How do you respond?**

14 A: UGI is proposing to increase residential rates by nearly 20% just a year after its Universal
15 Services and Energy Conservation Plan was approved by the Commission. As I explained
16 above, UGI has the lowest CAP enrollment rates compared to other Natural Gas Distribution
17 Companies. It also has much higher than average termination rates for its confirmed low income
18 customers -- and much lower corresponding reconnection rates -- than the average termination
19 and reconnection rates of Pennsylvania NGDCs. Recognizing UGI's programmatic lag, the
20 Commission required UGI to lift its maximum CAP enrollment and increase its LIURP

1 spending.³² However, in assessing the appropriateness of UGI's universal service programming
2 to serve its low income population, the Commission did not consider the impact that a significant
3 increase in rates such as the one proposed would have on UGI's low income customers and the
4 concomitant increase in the need for the programs. At the time UGI's USECP was approved,
5 there was no indication that rates would skyrocket in the following years. Indeed, the influx of
6 natural gas into the state through Marcellus Shale drilling promised to keep rates low for the
7 foreseeable future. But now, UGI is requesting to not only raise rates by nearly 20% -- it is in
8 requesting to raise the unavoidable portion of a residential customer's bill (the fixed charge) by
9 104%, from \$8.55/month to \$17.50/month.

10 To mitigate the potentially significant harm to low income residential ratepayers, it is
11 critical that UGI expand its Universal Service programs to meet the increased need for
12 programming that is certain to result.

13 **Q: Do you have any general observations about UGI's Universal Service Program**
14 **portfolio?**

15 **A:** Yes. UGI's dual CAP and LIURP program enrollment levels are very low, which
16 indicates to me that more coordination between the programs is needed to ensure that customers
17 are able to adequately access the full range of available programming. In 2012, 84 customers
18 were enrolled in both CAP and LIURP; in 2013, 47 were enrolled in both CAP and LIURP; and
19 in 2014, 59 were enrolled in both CAP and LIURP.³³ UGI's portfolio of universal program –

³² UGI USECP 2014-2017, Docket No. M-2013-2371824, Order Approving Joint Settlement (June 11, 2015) & Order on Elimination of CAP Enrollment Limits (September 5, 2015).

³³ Appendix B (Response of UGI to CAUSE-PA I-14 and attachments 1, 2, and 3).

1 particularly LIURP and CAP – are meant to work together to ensure that customers are receiving
2 bill assistance and usage reduction services, two primary components of sustained energy
3 affordability. Before any increase is granted, UGI should be required to take steps to increase its
4 coordination between its low income programs, and to increase the amount of LIURP available
5 to ensure that its low income customers are able to achieve long term financial stability.

6 **CUSTOMER ASSISTANCE PROGRAM (CAP)**

7 **Q: In reviewing UGI’s CAP, do you have any concerns with the program?**

8 A: Yes. In its last USECP proceeding, UGI was ordered to remove its CAP enrollment limit
9 in an attempt to bolster enrollment rates.³⁴ But since the order went into place in September
10 2015, CAP enrollment has actually gone down – not up.³⁵ Lifting enrollment rates expanded the
11 program capacity, but did nothing to change the policies and practices – such as insufficient
12 outreach, referral, and screening efforts – that cause the dearth in enrollment. Even bringing
13 CAP enrollment up to par would not remediate the additional harm to low income residential
14 customers that would result from UGI’s proposed rate increase. More outreach, reporting, and
15 programmatic oversight is needed to ensure that UGI’s low income population is able to access
16 adequate assistance through CAP.

17 One problem I see in reviewing UGI’s CAP is that UGI has outsourced all of its CAP
18 outreach and processing to Community Based Organizations. While I fully support use of CBOs,

³⁴ UGI 2014-2017 USECP, Order on Elimination of CAP Enrollment Limits, Docket M-2013-2371824 (Sept. 3, 2015).

³⁵ Appendix B (Response UGI to OCA III-4 and attachment). On the last day of September, 2015, CAP enrollment was at 9,257, but on the last day of January, 2016, CAP enrollment declined to 7,843. *Id.*

1 as they are located within the community they serve and are often best suited to conduct outreach
2 and intake with proper sensitivity, UGI's model relies too heavily on these organizations to
3 administer the program without providing the support necessary to serve this population.
4 Moreover, UGI has unduly restricted and deterred CBOs from conducting any positive outreach,
5 which is likely contributing to UGI's significantly lower than average CAP enrollment rates.

6 ****BEGIN PROPRIETARY****

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8 ****END PROPRIETARY****

9 In terms of other CAP outreach, UGI conducts an annual “cross-referral” process, in
10 which it mails a CAP application to customers who received LIHEAP in the previous year.⁴¹
11 When asked whether UGI followed up with customers after sending an application, UGI
12 indicated that “[a]ny customer inquiries or follow up actions were completed by the Company’s
13 agencies.”⁴² In other words, it appears there is no follow up unless the customer is in active
14 arrears with UGI. From what I can tell in reviewing UGI’s policies and USECP, its CAP
15 outreach is largely limited to this yearly mailing of CAP applications, which is not tracked or
16 subject to any follow-up. Because CBOs generally operate numerous low income programs at
17 the local level, they have a unique expertise that could be relied on to access, expand outreach,
18 and facilitate increased low-income participation in CAP. UGI should rely on this CBO expertise
19 and provide incentives to expand outreach and customer contacts, not limit the opportunity for
20 success by unduly limiting program implementation.

21 **Q: Do you have any recommendations for how UGI could improve its CAP and**
22 **mitigate the harm of a rate increase on low income customers?**

⁴¹ Appendix B (Response of UGI to CAUSE-PA I-11 and attachments -1, -2, -3, and -4).

⁴² Appendix B (Response of UGI to CAUSE-PA III-11).

1 A: UGI should be required to take concrete steps to bolster its CAP enrollment rates.
2 In addition to making specific policy changes to encourage positive customer outreach and
3 recruitment into the program, UGI should also be required to make referrals and screen for CAP
4 eligibility during all credit and bill-related calls. In addition, UGI employees should either be
5 able to conduct the CAP enrollment at the time of the screening/referral, or be able to transfer a
6 customer call directly to a CBO to process a CAP application over the phone – without having to
7 instruct the customer to call a different phone number. Finally, UGI should enhance its efforts to
8 coordinate its universal service programs across its portfolio and with other state and utility-run
9 assistance programs to leverage funding and provide holistic assistance to low income customers
10 that will help reduce their bills and promote financial stability over the long term.

11 **LOW INCOME USAGE REDUCTION PROGRAM (LIURP)**

12 **Q: Do you have any concerns about UGI's LIURP?**

13 A: When properly funded and administered, LIURP has the potential to significantly reduce
14 low income customer bills over the long term. But until recently, UGI's LIURP has been
15 seriously underfunded compared to other NGDCs. From 2010-2013, UGI completed 588
16 weatherization jobs;⁴³ and in 2014 and 2015, UGI completed a combined 194 LIURP jobs. In 5
17 years, that amounts to just 782 households served. As of January 1, 2016, UGI's LIURP budget
18 was increased by \$450,000; however, this increase was based on UGI's former rates, and does
19 not take into account the increased need for services to reach affordability after a rate increase.

⁴³ UGI 2014-2017 USECP at 25.

1 UGI's recent increase in LIURP funding does not necessarily translate to an increase in
2 completed jobs. As of April 1, 2016 – three months since the increased budget went into effect –
3 UGI has completed LIURP services for just six homes: three (3) single family homes and three
4 (3) individually metered multifamily units (apartments).⁴⁴ No services have been completed for
5 manufactured homes. UGI's track record for LIURP job completion does not inspire confidence
6 in its ability to significantly increase its job pacing: In 2014, UGI conducted 88 jobs at a cost of
7 \$529,676 – a full \$130,548 under budget.⁴⁵ Yet – despite UGI's underspending – the need for
8 program services is great: UGI estimates that approximately 7,449 customers are in need of
9 LIURP services.⁴⁶

10 Before any increase in rates is approved, UGI should be required to take affirmative steps
11 to increase its LIURP production to meet the needs of its customers. As I explained, the impact
12 of a rate increase will be felt most immediately and directly by low income customers who are
13 not enrolled in CAP. Connecting this population to LIURP is critically important to help these
14 customers to connect and maintain their natural gas service.

15 Given this significant unmet need, it is reasonable to incrementally increase UGI's
16 LIURP commensurate with the percentage that a customer's overall bill would increase as a
17 result of any increase granted in this base rate proceeding. Thus, effective with the date that
18 rates are put into place, I recommend that UGI be required to increase its LIURP budget
19 commensurate with the percentage increase to low-income customers at or below 150% FPL

⁴⁴ Appendix B (Response of UGI to CAUSE-PA IV-2 and attachment).

⁴⁵ UGI 2014-2017 USECP at A-4, A-5 (projecting 94 LIURP jobs at a budget of \$660,224); Pa. PUC, BCS, Report on 2014 Universal Service Programs and Collections Performance, at 38-39 (2015) (reporting actual 2014 LIURP spending by UGI at \$529,676 for a total of 88 completed jobs).

⁴⁶ UGI 2014-2017 USECP at B-1.

1 which is awarded in rates. That is, if UGI is awarded a rate increase which results in an average
2 increase of X% for non-CAP low-income households, then its LIURP budget should increase by
3 at least this amount.

4 **CUSTOMER ASSISTANCE AND REFERRAL EVALUATION SERVICES (CARES)**

5 **Q: Do you have any concerns about UGI's CARES Program?**

6 **A:** Yes. CARES has a relatively small budget and serves a small portion of customers, but is
7 supposed to serve an important role in addressing customers with an acute financial hardship.
8 CARES is designed, as UGI states in its policy, to “provide personal assistance and referrals to
9 payment-troubled customer and to help improve their bill payment problems.” It was originally
10 intended to serve as an intensive case management program where customers with an acute
11 hardship could receive additional assistance – including referrals to local agencies and
12 organizations that may be able to address the customer’s underlying hardship.⁴⁷ In reviewing
13 UGI’s CARES procedures and budget, it seems that UGI’s CARES is not being appropriately
14 utilized to adequately assist UGI’s vulnerable population. Instead of using the program to do
15 intensive case review and provide additional assistance, the overwhelming majority of UGI’s
16 CARES budget is spent on advertising. From 2013 to 2015, the overall CARES program
17 expenditures amounted to \$208,034, of which a total of \$120,968 was spent on advertising.⁴⁸
18 While advertising is a critical aspect of each universal service program, and should be
19 encouraged for each program to ensure that all eligible populations are aware of and informed

⁴⁷ UGI Statement 7, Stoyoko, at 13.

⁴⁸ Appendix B (Response of UGI to CAUSE-PA V-12 and attachment).

1 about their options, the CARES budget should not be used to fulfill advertising needs for other
2 programs.

3 In reviewing the cases that are handled by CARES, it is clear that CARES customers are
4 not provided with the sort of holistic case management and referral assistance that should be
5 available through CARES. Of the 118 customers listed as having received CARES service in
6 2015, ninety-five (95) received a grant through Operation Share; thirteen (13) received a
7 LIHEAP Cash Grant; nineteen (19) received a LIHEAP Crisis Grant; seven (7) were enrolled in
8 CAP; and zero (0) were enrolled in LIURP.⁴⁹ Just forty-seven (47) of the accounts listed
9 contained household income and occupancy data.⁵⁰ According to the income and household data
10 collected on these 47 accounts, every single customer met the income eligibility guidelines for
11 LIHEAP, CAP, Operation Share and LIURP.

12 The vast majority of customers processed through CARES are able to get their service
13 turned on and/or a pending termination stayed, and most are referred to Operation Share.
14 According to policy, CARES customers are also sent a referral packet which contains various
15 program brochures, with a cover letter which states:

16 Enclosed is information from UGI Cares Department.

17 The information enclosed is tips on energy savings, safety and also information on the
18 UGI Universal Services Programs.

19 Please take time to review the packet information. If you have any questions, please call
20 UGI at 1-800-UGI-Warm.⁵¹

⁴⁹ Appendix B (Response of UGI to CAUSE-PA III-5-a and attachment 5-a).

⁵⁰ *Id.*

⁵¹ Appendix B (Response of UGI to CAUSE-PA III-5-b and attachment 5-b-1).

1 These basic referral and customer assistance activities are good practice – but should be standard
2 when dealing with any customer who is having difficulty paying their bills, and in fact just meet
3 the minimum referral requirements contained in Chapter 14 for all payment troubled
4 customers.⁵²

5 CARES presents an opportunity for UGI to provide support for its customers in accessing
6 all of the programs available to the customer. At the very least, it provides an opportunity for
7 UGI to verify a customer as low income so that they are not later terminated in the winter.
8 Instead, fewer than half of the customers served through CARES are even questioned about their
9 household income and occupancy. CARES also provides a ready pipeline for CAP enrollment
10 and LIURP jobs. But rather than work with the customer to leverage available programming that
11 will promote the customer’s long-term financial stability, UGI gives the customer a cash grant to
12 temporarily fix their problem and sends them a packet of brochures. This is not the sort of
13 individualized and intensive assistance intended to be provided through CARES.

14 **Q: Do you have any recommendations to improve CARES?**

15 **A:** Yes. UGI should devote sufficient resources for a dedicated staff person with expertise
16 in social work to handle CARES. This person should work with clients individually to enroll
17 them in appropriate programs within UGI’s portfolio of Universal Service programs and to refer
18 them to agencies and services across the community – including Area Agencies on Aging,

⁵² 66 Pa. C.S. § 1410.1(1)-(2).

1 domestic violence programs, budget counseling and career development programs, drug and
2 alcohol counseling, health clinics, and other social service organizations and agencies.

3 **UGI PRACTICES, POLICIES, AND PROCEDURES**

4 **Q: You explained at the start of your testimony that you also wish to address UGI's**
5 **policies, practices, and procedures which govern access to UGI's service. Can you please**
6 **summarize the policies, practices, and procedures you wish to address?**

7 A: I plan to address UGI's inadequate procedures with regard to its identification of low
8 income customers; deficient security deposit waiver requirements; and medical certification
9 procedures.

10 **Q: What would you like to address about UGI's identification of low income**
11 **customers?**

12 A: Put simply, UGI is not adequately identifying and tracking its low income customers –
13 and in fact has policies in place which actively prevent its call center employees from
14 determining a customer's income level and tracking the customer in the system. Low income
15 customers are entitled to several important statutory and regulatory protections to ensure that
16 they are able to access and maintain safe utility service. For example, CAP-eligible customers
17 cannot be charged a security deposit to connect to or maintain service⁵³ and all households with
18 incomes below 250% of the federal poverty income guidelines cannot be terminated from
19 December 1 through March 31 during the winter moratorium.⁵⁴ UGI will not be able to fully

⁵³ 66 Pa. C.S. § 1404(a.1) (Cash deposit prohibition).

⁵⁴ 66 Pa. C.S. § 1406(e).

1 protect these customers, as it is mandated to do, if it does not first identify the customer as low
2 income in their system.

3 Compared to equivalent NGDCs, UGI has a significantly lower percentage of customers
4 identified as low income in its system. In 2014, Peoples Natural Gas and UGI had nearly the
5 same number of residential customers and estimated low income customers.⁵⁵ Yet Peoples
6 confirmed 18% of its residential customers as low income, while UGI confirmed just 12.6% of
7 its residential customers as low income.⁵⁶ It is also noteworthy that UGI's confirmed low
8 income population has declined in recent years – despite steady poverty rates across the state and
9 in UGI's service territory. Since 2014, UGI's confirmed low income customer count
10 inexplicably decreased from 41,639 to 35,100.⁵⁷

11 UGI's internal policies and practices are impeding the identification of low income
12 customers and, in turn, the application of protections for low income customers that reside within
13 its service territory. For example, UGI employees received updated policies on December 22,
14 2014, which explained the security deposit waiver for low income households, but forbid
15 employees from asking for income information from applicants, instructing:

⁵⁵ PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 6, 8 (2015), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf.

Peoples' Residential Gas Customers, 330,459; UGI Residential Gas Customers, 331,583.
Peoples Estimated Low Income Customers, 85,919; UGI Estimated Low Income Customers, 84,809.

⁵⁶ PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 6-7 (2015), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf.

⁵⁷ PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 7 (2015), available at http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf; see also Appendix B (Interrogatory Response CAUSE-PA I-4 and attachment).

- 1 • **You will not ask** for income verification on an initial application.
- 2 • If not already confirmed eligible for a customer assistance program and a
- 3 deposit is required due to a customer’s poor payment history, **you will quote**
- 4 **the deposit.**
- 5 • If an applicant states they are not able to afford the deposit and provide you
- 6 with detailed information about their income that implies they are low-
- 7 income, the deposit should be waived.⁵⁸

8 The public utility code specifically forbids imposing a security deposit for any household that is
9 confirmed to be CAP-eligible.⁵⁹ Through its policy, UGI avoids this obligation by not inquiring
10 about CAP eligibility and in fact even when it knows about CAP eligibility, adding an
11 eliminating condition based upon poor payment history, which totally negates the intent of the
12 statutory change. In my judgment, refusing to inquire regarding CAP eligibility unless the
13 household raises the issue and adding an impermissible disqualifying factor of poor payment
14 history violates the intent and language of the recently enacted provision in question. UGI’s
15 policy not only “hides the ball” from the low income customer by requesting a security deposit
16 without explaining that a waiver may be obtained, it explicitly forbids employees from inquiring
17 with the customer whether a waiver might apply. A customer is only given information about
18 the waiver after disclosing that they are low income – without prompting from the UGI
19 employee – and providing “detailed information” about their income. But low income customers
20 are typically not aware that being low income would entitle them to a security deposit waiver,
21 and are thus unlikely to disclose their status as a low income customer without first being
22 informed of the possibility of waiver.

23 UGI’s policy prohibiting employees from asking about an applicant or customer’s
24 income creates a domino effect: Low income customers are not identified when they set up

⁵⁸ Appendix B (Response of UGI to CAUSE-PA II-25 and attachment)

⁵⁹ 66 Pa. C.S. 1404(a.1).

1 service, and are charged a security deposit - which they are most likely unable to pay without
2 sacrificing other essentials such as housing, food, and medicine. Unable to pay the security
3 deposit, the customer falls behind on their monthly bill and is at risk of termination.⁶⁰

4 Further, it appears from reviewing UGI's call center training documents that it is UGI's
5 policy to remove low income identifiers from customer accounts after 1 year – which perhaps
6 explains the drastic decrease in confirmed low income customers since 2014 that I noted above.
7 In identifying the information a call center employee should gather to establish a new account,
8 step 7 provides:

9 Number of people, including children, residing at the property. (Use the income
10 guidelines chart to determine if the household income is below poverty level). A
11 low income guidelines chart is given to the CCR every year. ... **If the customer is**
12 **low income, the mail screen will display Low Income along with an expiration**
13 **date which is one year from the date the account automates.**⁶¹

14
15 The policy does not indicate that income is ever requested, so it is unclear how an employee
16 performs the income calculation – especially in light of the policy I explained above which
17 prohibits call center employees from asking for income information. But that issue aside, UGI's
18 removal of customers from low income designation in their system after one year is
19 inappropriate. There is no indication that any follow-up is performed to identify whether a
20 customer has increased their income above 150% FPL over a twelvemonth period.

21 Policies such as those described above are unduly restrictive and prevent low income
22 consumers from accessing and maintaining affordable natural gas service through assistance

⁶⁰ The hope would be that the customer would then be referred to CAP and other universal services. But, without indication that the customer is low income in the system, most end up in the termination process without ever being referred to UGI's universal service programs. Ms. Kay Pickering explained at the public input hearing that many of the clients she serves were not referred to universal service programs before being terminated, and eventually being connected with her program to find assistance. (March 31, 2016, 1:00 pm Public Input Hearing).

⁶¹ Appendix B (Response of UGI to CAUSE-PA II-8 and attachment, at 3 (emphasis added)).

1 programs like CAP. The negative impact of such policies will be compounded if rates were to
2 also increase. Before any rate increase is approved, UGI should be required to extensively revise
3 its policies and procedures to proactively identify low income customers during any and all
4 points of non-emergency customer contact. Doing so will ensure that the statutory protections
5 provided to low income customers – including security deposit waivers and the winter
6 moratorium - are appropriately implemented and administered throughout UGI’s service
7 territory.

8 **Q: You mentioned security deposit waivers above in discussing UGI’s policies for**
9 **identifying low income customers. Is there anything else regarding UGI’s security deposit**
10 **waiver policy that you would like to address?**

11 A: Yes. UGI’s policy allows waiver for CAP eligible customers, but *requires* the
12 customer to then enroll in a universal service program or be subject to a future security deposit.
13 According to UGI’s policy, if a security deposit is waived based on the applicant’s income, UGI
14 employees are required to: “[e]xplain to the customer that failure to enroll into a customer
15 assistance program or pay on time, they may be assessed a deposit at a later date.”⁶² This policy
16 is only found in an update dated 12/22/2014, and is not reflected in its training materials used to
17 educate staff about policies and procedures for establishing service.⁶³

18 The security deposit waiver provides the following: “[N]o public utility may require a
19 customer or applicant that is confirmed to be eligible for a customer assistance program to
20 provide a cash deposit.”⁶⁴ There is no requirement that a customer enroll in a customer assistance

⁶² Appendix B (Response of UGI to CAUSE-PA II-25 and attachment, at 1).

⁶³ Appendix B (Response of UGI to CAUSE-PA II-8 and attachment).

⁶⁴ 66 Pa. C.S. 1404(a.1).

1 program, they must merely be “confirmed to be eligible.” Likewise, the exemption explicitly
2 applies to both applicants and customers, and does not provide for later assessment of a security
3 deposit if the eligible customer is late making a bill payment.

4 While I believe that low income consumers would benefit from enrollment in a Universal
5 Service program, there may be valid reasons for a particular customer not to enroll and that
6 decision is up to the customer. As I explained at the start of my testimony, low income customers
7 pay a disproportionately high percentage of their income on energy costs, and often go without
8 other basic necessities – such as food and medicine - to make ends meet. An upfront security
9 deposit – above and beyond the monthly bill – presents an insurmountable barrier for many low
10 income households attempting to connect to natural gas service.

11 The law does not restrict security deposit waiver to those enrolled in a customer
12 assistance program. Charging a security deposit for failure to enroll in a customer assistance
13 program unnecessarily restricts the ability for low income consumers to access and maintain
14 their natural gas service. As such, UGI’s requested rate increase should not be approved unless
15 and until UGI revises its policies to ensure that low income customers are able to connect to and
16 maintain their service without being forced to pay prohibitive up-front costs.

17 **Q: What would you like to address about UGI’s Medical Certification process?**

18 A: I am concerned that UGI’s medical certificate process creates a dangerous situation for
19 medically vulnerable customers.

20 First, UGI’s medical certification process inappropriately limits the number of times that
21 a customer may renew a medical certificate. In relevant part, UGI’s policy provides:

22 If there has already been 1 medical certification and 2 renewals, review the account to see
23 if the delinquent balance had been satisfied.
24 • If the balance was satisfied, the customer is eligible

- 1 • If the balance was not satisfied, the customer is not eligible.⁶⁵

2 This policy is not in accord with Commission policy set during the Commission's
3 Chapter 56 rulemaking in 2011, which provides that a customer of a regulated utility may
4 continue to renew a medical certificate provided they pay the *current* amount due – not the entire
5 account balance.⁶⁶ The Commission explained the reason for its decision:

6 We also understand FirstEnergy's concerns with the payment of the outstanding
7 balance. In response, we point out that **if the customer is paying their current**
8 **bills as required by this section, the outstanding balance will not be increasing,**
9 **meaning that the customer's and the utility's problems with the account**
10 **balance will not be aggravated.** We expect that once the medical certificate
11 expires, the utility would address the outstanding balance with the customer. We
12 also point to the petition process at § 56.118 that a utility may use to possibly void
13 a medical certificate that a utility believes is being used to avoid the payment of the
14 account balance. We must also reject PPL's advice because their suggestion that
15 we require an arrangement on all current and overdue balances might be considered
16 a payment agreement, which may conflict with Section 1405(d)'s restrictions on
17 the Commission's authority to order payment agreements.⁶⁷

18 The Commission reiterated this explanation in its Final Order regarding Chapter 14
19 Implementation and concluded that its policy in 2011 remains valid today and must be adhered
20 to by regulated utilities until a future rulemaking:

21 Until [a future Chapter 56 rulemaking], we reiterate what we said in the 2011 rulemaking
22 and in the current 52 Pa. Code § 56.116: that customers 'shall retain a duty to make
23 payment on all current undisputed bills or budget billing amount...' while under the
24 protection of a medical certificate. We further reiterate that this means the current bill (or
25 budget bill) amount must be paid in full by the due date.⁶⁸

⁶⁵ Appendix B (Response of UGI to CAUSE-PA II-11 and attachment).

⁶⁶ *Revised Final Order, Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Provisions of 66 Pa. C.S., Chapter 14; General Review of Regulations*, Docket No. -00060182, at 49 Attach. 1 (Order Entered June 13, 2011).

⁶⁷ *Id.*

⁶⁸ Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 14-15 (July 9, 2015).

1 UGI's internal policy directly contravenes Commission policy and requires the full
2 balance – including arrears – be paid by a customer prior to allowing a 4th medical certificate
3 renewal, and creates a serious risk of creating substantial medical consequences for the customer
4 or their household member. When a customer submits a medical certificate, they are doing so
5 because someone in their household is seriously ill or requires service to treat a medical
6 condition. As I explained above, the process for obtaining a medical certificate is onerous, and
7 requires a physician, physician assistant, or nurse practitioner to be personally invested in the
8 process. The Commission's policy – recognizing the extreme hardship a family faces when they
9 must resort to the medical certification process – holds the customer responsible for the current
10 charges, but places the remainder of the balance on hold until the medical emergency subsides.
11 UGI should be required to uphold this same policy to ensure that its customers are able to access
12 service with the same rights and obligations of customers in other utilities across the state.

13 In addition to the incorrect renewal policy, the process for submitting a medical
14 certificate is otherwise unduly restrictive, and likely prohibits customers from accessing medical
15 certificate relief in a reasonable manner. UGI's policy provides that the doctor's office must call
16 UGI directly: "Customer should be advised to have the doctor's office call UGI immediately."⁶⁹
17 While an exception is made for the doctor's office to request UGI's form via email or fax, the
18 customer is explicitly prohibited from obtaining the form to bring to their doctor's office for
19 signature: "UGI will not fax a medical certification form directly to the customer."⁷⁰

⁶⁹ Appendix B (Response of UGI to CAUSE-PA II-11 and attachment)

⁷⁰ *Id.* In its Chapter 14 Implementation Order, the Commission was explicit that "Utilities that develop ... a form are encouraged to make these readily available to medical professionals **and customers**, including placement on the utility's website." Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 15 (July 9, 2015) (emphasis added).

1 It can be difficult and often expensive for low income customers to get an appointment
2 with their physician, physician’s assistant, or nurse practitioner within the requisite 3 days.⁷¹ In
3 addition to securing a last-minute appointment, the customer must often take off work, secure
4 childcare, arrange transportation, and/or pay a large deductible or copay simply to get in to talk
5 with their treating physician, physician assistant, or nurse practitioner. The additional burden of
6 asking the physician, physician’s assistant, or nurse practitioner to call UGI directly to obtain a
7 form adds needlessly to the already burdensome regulatory requirements.

8 Finally, UGI’s medical certificate policy – as written – gives the impression that its form
9 is required, which is again directly contrary to Commission policy which allows a certifying
10 professional to produce any written document which contains the required information –
11 regardless of the form used.⁷² UGI states in its policy that it will accept a “note on a prescription
12 pad or a doctor’s office letterhead, including all of the required information” – but it does not
13 provide any notice to the customer or the doctor that this alternative is acceptable. Likewise, its
14 exception fails to note that any writing – not just a writing on letterhead or prescription pad – is
15 sufficient. In fact, when the doctor’s office calls UGI, UGI’s call center employees are
16 instructed: “Advise the doctor’s office that the form must be completed and returned to UGI as
17 soon as possible to avoid interruption of service; or to restore service.”⁷³ No alternative options
18 are explained to the certifying professional. As a practical matter, UGI’s process for medical

⁷¹ According to a recent study of health care provider wait times revealed that the average wait-time for a medical appointment with a family practice physician was 21 days. Merritt Hawkins, Physician Appointment Wait Times and Medicaid and Medicare Acceptance Rates: 2014 Survey, at 11 (2014), *available at* <http://www.merrithawkins.com/uploadedFiles/MerrittHawkings/Surveys/mha2014waitsurvPDF.pdf>.

⁷² Appendix B (Response of UGI to CAUSE-PA II-11 and attachment, at 2); Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 15 (July 9, 2015) (“Utilities may develop a [medical certificate] form and encourage its use – but its use cannot be mandatory.”).

⁷³ Appendix B (Response of UGI to CAUSE-PA II-11 and attachment, at 2).

1 certification imposes a form requirement on customers attempting to submit a medical certificate
2 to prevent termination of service when they are seriously ill or need service to treat a medical
3 condition. This is inappropriate. UGI must revise its medical certificate policy to accept any
4 written document which contains the required information and to eliminate inference that UGI's
5 medical certificate form is required.

6 **ENERGY EFFICIENCY AND CONSERVATION PLAN**

7 **Q: Have you reviewed UGI's proposed Energy Efficiency and Conservation Plan?**

8 A: Yes, to the extent that it addresses low income populations.

9 **Q: How does UGI's proposed Energy Efficiency and Conservation Plan address low**
10 **income populations?**

11 A: The short answer is: It doesn't. UGI witness Theodore Love explains:

12 Low income customers are allowed to participate in any of the programs open to
13 residential customers. Although no program in the proposed EE&C portfolio specifically
14 targets this market segment, UGI Gas already has a Low Income Usage Reduction
15 Program ("LIURP") as discussed in the direct testimony of Robert R. Stoyko (UGI Gas
16 Statement No. 7).

17 **Q: Do you have any concerns about UGI's lack of targeted low income programs in its**
18 **EE&C Plan?**

19 A: UGI models its proposed programming on Act 129 energy efficiency and conservation
20 programming,⁷⁴ but has completely ignored a major component of Act 129: The recognition that
21 low income customers are unable to access most residential programs because the upfront cost of

⁷⁴ UGI Statement 11, Love, at 3-4.

1 participation is prohibitive.⁷⁵ In Phase III of Act 129 – which is set to go into effect as of June 1,
2 2016 – the Commission required electric companies create programming for low income
3 customers capable of producing 5.5% of its overall savings.⁷⁶

4 The vast majority of low income customers (those not enrolled in CAP) will pay UGI’s
5 proposed “EE&C Rider.”⁷⁷ But as a practical matter, this group of customers will be foreclosed
6 from participating in the programming. To prevent an unjust result, UGI should either exempt
7 its confirmed low income customers from paying the EE&C Rider, or increase LIURP funding
8 by the amount collected from low income customers.

9 In addition to exempting low income customers from the EE&C Rider – or apportioning
10 those funds to LIURP – UGI should use the EE&C programs to generate LIURP referrals.
11 Customers inquiring about the EE&C program should be screened for LIURP eligibility and
12 should be referred.

13 **CONCLUSION**

14 **Q: Please summarize your conclusions and recommendations**

15 **A:** Before any rate increase is approved, UGI should be required to make the following
16 changes and/or revisions to ensure that low income customers are able to access natural gas service
17 within UGI’s service territory at just and reasonable rates and terms:

- 18 • Reject UGI’s proposal to increase its fixed customer charge, and apply any approved
19 increase to the volumetric charge.

⁷⁵ See 66 Pa. C.S. § 2806.1(b)(i)(G).

⁷⁶ Energy Efficiency and Conservation Program, Phase III Implementation Order, Docket M-2014-2424864, at 69 (entered June 19, 2015).

⁷⁷ UGI Statement 6, Lahoff, at 19.

**CAUSE-PA Statement 1, Mitchell Miller
PUBLIC VERSION**

- 1 • Increase coordination between UGI’s Universal Service programs, particularly CAP and
2 LIURP.
- 3 • Revise CAP agency contracts to include incentives for successfully achieving established
4 goals for customer outreach, education, customer contact, and enrollment.
- 5 • Improve UGI call center staff education about universal service programs.
- 6 • Streamline the customer referral process for universal service programs by allowing
7 direct processing of applications and/or direct transfer from UGI to the local agency
8 handling the intake.
- 9 • Improve customer communications about all aspects of CAP.
- 10 • Increase LIURP funding by a percentage commensurate with the percent of any approved
11 increase.
- 12 • Devote a full-time staff person with social work expertise to administer the CARES
13 program.
- 14 • Ensure that customers who enter CARES are assisted with enrollment in all available
15 universal service programs.
- 16 • Revise policies, practices, and procedures to proactively identify low income customers
17 during all points of non-emergency customer contact.
- 18 • Revise security deposit policy to ensure that customers are informed that CAP eligibility
19 prohibits the request of a security deposit and are screened for that eligibility before
20 being asked to pay security deposit amount.
- 21 • Remove requirements for low income customers to enroll in a universal service program
22 as a condition to receiving a security deposit waiver.

- 1 • Revise security deposit policy to apply equally to both applicants and customers.
- 2 • *Eliminate the restriction on medical certificate renewals for nonpayment of non-current*
- 3 *charges.*
- 4 • Provide customers with a copy of UGI's medical certificate form upon request.
- 5 • Eliminate the requirement that the physician's office contact UGI directly to request a
- 6 medical certificate form.
- 7 • Revise medical certificate policy to accept any written document which contains the
- 8 required information.
- 9 • Revise medical certificate policy to eliminate inference that UGI's medical certificate
- 10 form is required.
- 11 • Exempt confirmed low income customers from the EE&C Rider, or designate EE&C
- 12 Rider funds collected from confirmed low income customers directly to LIURP.

13 **Q. Does this conclude your Direct Testimony?**

14 A. Yes.

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EMPLOYMENT

2009-Present Mitch Miller Consulting LLC:

Practice provides consulting services that promote the public interest with a focus on low income households. Specifically over 35 years of expertise is applied to the evaluation of regulatory policy involving customer service, complaint handling, credit and collections and universal service. Objective is to promote public policy development, program design, and implementation of programs for consumer education, energy efficiency, credit and collections, and customer assistance.

2009-2012 Pennsylvania Department of Community and Economic Development Consultant

Served as a Consultant on weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program (WAP) at PA DCED. Was instrumental in transforming the WAP program by creating a performance-based system, dedicated to a high standard of quality, compliance and production. Innovations include introducing performance standards for production, quality and compliance and independent certification and training for all state WAP workers. Also responsible for coordinating the states WAP program with the PUC, utilities and other efficiency programs.

1992-2009 Pennsylvania Public Utility Commission, Bureau of Consumer Services Harrisburg, PA Director

Until his retirement from state service Mr. Miller was director of Consumer Services and PA PUC. His bureau has regulatory authority and responsibility for policy development for all areas of consumer services including resolving consumer complaints and problems, enforcing consumer regulations, developing, implementing and evaluating programs involving complaint handling, complaint analysis collections, enforcement of consumer regulations, utility customer assistance programs and low income conservation. He also directed BCS responsibilities for implementing the Pennsylvania Electric, Gas and Telephone Customer Choice Programs. Specific areas under his Direction include:

Program evaluation and regulation

- Monitoring and evaluating the customer service practices and programs of utilities
- Promulgating regulations, implementing procedures to meet regulatory requirement and taking enforcement action to assure compliance

- Field reviews and audits of utilities' operations and advice the Commission regarding issues of interest and concern of utility consumers
- Compliance enforcement including informal investigations and prosecution of formal cases
- Track trends in the number and type of consumer complaints and inquiries, utility performance at handling customer complaints and payment arrangement requests. Other databases utilized to track utility termination activity, collection of delinquent accounts, compliance with customer service regulations and other areas critical to evaluating utility customer service performance.
- Produce utility performance and evaluative reports for the PUC, utilities and the public

Universal service programs

- The LIURP is targeted toward low-income households with the highest energy consumption, payment problems, and high arrearages. Since the program's inception to 2009, the major electric and gas companies required to participate in LIURP have spent over \$530 million to provide weatherization treatments to more than 350,000 low-income households in Pennsylvania. The budgets for 2008 were 22 million for electric utilities and 9 million for gas utilities
- Customer Assistance Programs (CAPs) provide an alternative to traditional collection methods for low income, payment troubled utility customers. Customers make regular monthly payments, which may be for an amount that is less than the current bill for utility service. Budgets for CAP programs in 2008 were 189 million for electric companies and 174 million for gas companies. Utility companies have spent over 2 billion dollars for CAP through 1998.

Utility Complaint Handling and Regulation

- Responsible for establishing procedures and directing 90 staff in investigating annually over 100,000 informal consumer complaints for regulated fixed utilities, payment arrangement requests and responding to over 70,000 inquiries.
- Arbitrate billing, credit and other informal complaints and issue binding decisions to resolve informal disputes expeditiously. Investigators also issue decisions regarding the amortization of overdue electric, gas, steam heat, water, wastewater and basic telephone bills.

1978-1992 Pennsylvania Public Utility Commission, Division of Research and Planning Harrisburg, PA

Chief

Reported to Director of Bureau of Consumer Services with direct responsibility for the direction, supervision and planning of a Division of 15 professionals who are delegated program responsibilities for regulation enforcement, utility program evaluation, customer assistance programs and consumer education. As the first Division Chief he was instrumental in creating these activities

- Bureau's compliance program in enforcing customer service regulations and statues through regulator interpretations, citations and litigation; including preparing with legal staff formal records, briefs, motions, interrogatories, reviewing utility responses and negotiating equitable settlements.

- Development and implementation of computer information evaluation systems for evaluation of utility customer service programs; systematic performance problems are identified through statistical analysis and observation and correction actions recommended via public reports, formal rate cases and consumer services audit programs.
- Managed the development of Commission's first consumer education program including proposing annual plans, statewide networking, supervising staff in conducting of workshops and conferences, and preparation of consumer education materials.
- Supervised the development of an integrated program for low income consumers; through program evaluation, leading to testimony, preparation of policy recommendations, interdepartmental coordination, regulation promulgation and establishing evaluation criteria

1977-1978 Pennsylvania Public Utility Commission

Harrisburg, PA

Research Analyst

Responsible for evaluating existing utility and Commission customer service programs and identifying problems and recommendations for change, which led to Division's current programs.

1974-1977 Governor's Action Center

Harrisburg, PA

Research Supervisor

Office supervisor for a research and information unit. Duties included the modification and maintenance of an information and evaluation system, writing technical and topical reports, quality control review and staff training. Responsible for the supervision of five case evaluator and student interns.

EDUCATION

M.S., Shippensburg University, 1984

Major: Public Administration

G.P.A. 3.9/4.0

B.S., Pennsylvania State University, 1974

Major: Community Development

Cum Laude

Additional Affiliations

Board of Directors, Keystone Energy Efficiency Alliance

Co-Chair Keystone Energy Efficiency Alliance Conference

Member, Pennsylvania WAP Policy Advisory Council

Past Co-Chair National Energy and Utility Affordability Conference

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Response of UGI to CAUSE-PA I-4

Question 4 (Prepared by Robert Stoyko)

As of the date of this response, how many confirmed low-income customers reside within UGI's service territory, disaggregated by percentage of federal poverty level (0-50%, 51-100%, 101-150% of the Federal Poverty Level)? Please also explain how UGI confirms a customer as low income.

Response:

Please see Attachment CAUSE-PA I-4.

Attachment File Name	Attachment Note
<u>CAUSE-PA 1-4.pdf</u>	

Percent of Federal Poverty	# of customers*
0%-50%	5,178
51%-100%	9,531
101%-150%	7,563
151% -200%	4,083
Unknown Income	8,745
Total	35,100

*As of March 1, 2016

UGI customers are classified as confirmed "low income" if they:

- participate in CAP (agency verifies income)
- receive LIHEAP, CRISIS, Operation Share, or other assistance (agency verifies income)
- were weatherized within the last twelve months (agency verifies income)
- self-reported income of level 1 or 2

Response of UGI to CAUSE-PA I-5

Question 5 (Prepared by Robert Stoyko)

As of the date of this response, how many estimated low income customers reside within Columbia's service territory? Please disaggregate by income (50%, 100%, and 150% of federal poverty level (FPL)) and explain how UGI arrived at its estimated figures. Include a copy of any and all workpapers, reports or studies used to perform the estimation.

Response:

CAUSE-PA verified that this request is for UGI Gas Service. UGI's estimated low income customer count is based on census data. The Pennsylvania Bureau of Consumer Services provided an updated census file on June 4th, 2014. UGI used this data when we submitted our 2014-2017 USCEP. UGI is not able to disaggregate this data by income. Refer to Attachment CAUSE-PA-I-5.

Attachment File Name

Attachment Note

CAUSE_Set I-5.pdf

Poverty Levels for Pennsylvania Counties (Low Income - < 150 and Higher Income 150 >): 2010-2012.
 Poverty Levels Shown for Households, Families and Individuals.
 Source: 2010-2012 American Community Survey 3-Year Estimates - United States Census Bureau
 File Received 6-4-2014; S. Dewey Email
 PUC Provided Census Data

Attachment Cause-PA I-5
 R. R. Stoyko
 Page 1 of 1

County	Total N	N *	% *	UGI-Gas	UGI-Gas 150%
Adams	37919	8501	22.42%		
Allegheny	522238	133670	25.60%		-
Armstrong	28735	8376	29.15%		-
Beaver	70787	19128	27.02%		-
Bedford	20570	6608	32.12%		-
Berks	154092	43374	28.15%	65,638	18,476
Blair	50990	16134	31.64%		-
Bradford	24103	7921	32.86%		-
Bucks	230384	31980	13.88%	6,862	953
Butler	73147	15473	21.15%		-
Cambria	58197	18052	31.02%		-
Carbon	25919	6965	26.87%	32	9
Centre	57266	19759	34.50%		-
Chester	184364	28115	15.25%	18	3
Clarion	16027	5869	36.62%		-
Clearfield	32158	10466	32.55%		-
Clinton	15287	5033	32.92%		-
Columbia	26188	8650	33.03%		-
Crawford	35042	12165	34.72%		-
Cumberland	95126	17309	18.20%	34,037	6,193
Dauphin	107891	29307	27.16%	45,525	12,366
Delaware	205185	45158	22.01%		-
Elk	13596	2824	20.77%		-
Erie	109522	35654	32.55%		-
Fayette	54372	20392	37.50%		-
Franklin	57739	15053	26.07%		-
Greene	14222	4366	30.70%		-
Huntingdon	16992	4933	29.03%		-
Indiana	34652	12699	36.65%		-
Jefferson	18637	6469	34.71%		-
Juniata	9321	3051	32.73%		-
Lackawanna	85721	25379	29.61%		-
Lancaster	193931	49905	25.73%	63,266	16,280
Lawrence	36752	11698	31.83%		-
Lebanon	51807	12881	24.86%	16,863	4,193
Lehigh	133322	38978	29.24%	46,540	13,606
Luzerne	130097	41496	31.90%	7,524	2,400
Lycoming	45933	14484	31.53%		-
McKean	17373	5967	34.35%		-
Mercer	46345	14969	32.30%		-
Mifflin	18947	7373	38.91%		-
Monroe	58173	15786	27.14%	143	39
Montgomery	307618	46236	15.03%	2,464	370
Northampton	112120	23948	21.36%	44,980	9,607
Northumberland	39109	12149	31.06%		-
Perry	18231	4265	23.39%		-
Philadelphia	576889	262214	45.45%		-
Pike	21759	4748	21.82%		-
Schuylkill	59689	17548	29.40%	22	6
Snyder	14481	4587	31.68%		-
Somerset	29626	9077	30.64%		-
Susquehanna	17001	5012	29.48%		-
Tioga	17039	5644	33.12%		-
Union	15295	4346	28.41%		-
Venango	22956	7761	33.81%		-
Warren	17046	5169	30.32%		-
Washington	83920	19617	23.38%		-
Wayne	19521	6040	30.94%		-
Westmoreland	152022	38247	25.16%		-
Wyoming	10852	2995	27.60%		-
York	168566	38362	22.76%	1,351	307
Total (for 61 counties)	4922809	1360335	27.63%	335,265	84,809.63
Total (for 67 counties) **	4949625	1368512	27.65%		

Response of UGI to CAUSE-PA I-6

Question 6 (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's confirmed low-income customers were/are enrolled in CAP, disaggregated by income level (0-50%, 51-100%, 101-150% FPL)?

Response:

Please see Attachment CAUSE-PA I-6.

<u>Attachment File Name</u>	<u>Attachment Note</u>
<u>CAUSE-PA I-6.pdf</u>	

Attachment CAUSE-PA I-6

R.R. Stoyko

Page 1 of 1

Percent of Federal Poverty	CAP Participants*
0%-50%	2,463
51%-100%	3,808
101%-150%	1,695

*As of 3/2/16

Response of UGI to CAUSE-PA I-7

Question 7 (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's confirmed low-income customers received a LIHEAP Cash Grant and/or Crisis Grant in the 2015-2016 LIHEAP program year? Please disaggregate by the type of grant received (Cash only, Crisis only, or both Cash and Crisis) and income level (0-50%, 51-100%, 101-150% FPL).

Response:

Please see Attachment CAUSE-PA I-7.

Attachment File Name	Attachment Note
CAUSE-PA I-7.pdf	

Percent of Federal Poverty	# of customers*	Cash Only	Crisis Only	Both
0%-50%	448	390	56	2
51%-100%	712	642	65	5
101%-150%	350	325	23	2
Unknown Income	6,159	5,262	37	860

*As of March 1, 2016

Response of UGI to CAUSE-PA I-8

Question 8 (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's customers were enrolled in CAP, but did not receive a LIHEAP Grant in the 2015-2016 LIHEAP program year?

Response:

Of 7,966 CAP participants, 5,497 have not received a LIHEAP grant that was applied to their UGI account. An unknown number of participants may have received LIHEAP for another provider.

No Digital Attachments Found.

Response of UGI to CAUSE-PA I-11

Question 11 (Prepared by Robert Stoyko)

What efforts, if any, does UGI make to enroll non-CAP customers in CAP who have applied for and received LIHEAP? Please include any documents used in CAP outreach efforts, including copies of letters to customers, phone scripts, marketing materials, and other supporting documentation.

Response:

UGI completes an annual cross referral process. LIHEAP recipients are reviewed and if eligible, a CAP application is mailed. Additionally, when calling UGI, LIHEAP recipients are referred to CAP by UGI's Customer Care Team. Calls related to past due balances or termination notices are also screened for CAP eligibility.

Contracted Community Based Organizations receive information regarding CAP solicits when appropriate. Please see Attachments CAUSE-PA I-11-1, 11-2, and 11-4, which are examples of the types of outreach materials used to expand CAP participation.

The UGI website contains information on the Customer Assistance Programs. Please see Attachment CAUSE-PA I-11-3.

Attachment File Name	Attachment Note
CAUSE-PA I - 11-3.pdf	
CAUSE-PA Set I - 11-1.pdf	
CAUSE-PA Set I - 11-2.pdf	
CAUSE-PA Set I - 11-4.pdf	



LIHEAP Recipient

March 2, 2016

CUSTOMER
MAILING ADDRESS
CITY/ST/ZIP

ACCOUNT NO.
SERVICE ADDRESS
CITY/ST/ZIP

Dear Customer,

Thank you for your recent request to participate in UGI's Customer Assistance Program (CAP). This program may provide your household with an affordable, monthly payment calculated on a percent of income, average bill, or minimum allowable amount.

Please review the "CAP Income Guidelines" below to determine if you are eligible for the program.

Household Size	Monthly Income
1	\$1,485
2	\$2,003
3	\$2,520
4	\$3,038
5	\$3,555
6	\$4,073
7+ (Add)	\$520

If you meet these guidelines and are interested in applying for CAP, please complete the enclosed application and return the application to: **AGENCY NAME, ADDRESS, CITY/ST/ZIP**. You will be contacted by a CAP caseworker once your application has been reviewed. Applications are reviewed in the order in which they are received.

If you have any questions about CAP, please call our office at 1-800-276-2722.

Sincerely,

UGI Customer Outreach Department

Used for LIHEAP recipients



March 2, 2016

CUSTOMER
MAILING ADDRESS
CITY/ST/ZIP

ACCOUNT NO.
SERVICE ADDRESS
CITY/ST/ZIP

Dear Customer,

Thank you for your recent request to participate in UGI's Customer Assistance Program (CAP). This program may provide your household with an affordable, monthly payment calculated on a percent of income, average bill, or minimum allowable amount.

Please review the "CAP Income Guidelines" below to determine if you are eligible for the program.

Household Size	Monthly Income
1	\$1,485
2	\$2,003
3	\$2,520
4	\$3,038
5	\$3,555
6	\$4,073
7+ (Add)	\$520

If you meet these guidelines and are interested in applying for CAP, please return the completed application, proof of income, and a copy of valid identification to: **AGENCY, ADDRESS, CITY/ST/ZIP**. You will be contacted by a CAP caseworker once your application has been reviewed. Applications are reviewed in the order in which they are received.

If you have any questions about CAP, please call our office at 1-800-276-2722.

Sincerely,

UGI Customer Outreach Department

Used for non LIHEAP recipients

Gasline

FEBRUARY 2016

▶ **February Featured
Community Organization:
American Heart Association**

February's Featured Community Organization is the American Heart Association (AHA) in honor of American Heart Month.

With a mission "to build healthier lives, free of cardiovascular diseases and stroke," The American Heart Association helps inform people how making better lifestyle choices can help prevent heart disease, the leading cause of death for both men and women in America. AHA has over 22.5 million volunteers and supporters.



One of AHA's most impactful campaigns takes place on the first Friday in February each year: National Wear Red Day invites everyone to wear red in an effort to raise awareness and provide information about the risks of heart disease and stroke in women.

For more information, please visit UGI's blog, "UGI Connection" at <http://blog.ugi.com>, and the UGI website, www.ugi.com/featuredorganization, during February.

▶ **Get more energy tips and news from UGI via your favorite social media sites:**

- [facebook.com/ugilities](https://www.facebook.com/ugilities)
- twitter.com/ugi_utilities
- [@UGIReads](https://www.instagram.com/UGIReads)
- [youtube.com/ugilities](https://www.youtube.com/ugilities)
- blog.ugi.com
- [@UGIUtilities](https://www.linkedin.com/company/ugi)
- www.ugi.com/linkedin
- www.ugi.com/email



Convenient Options for Paying Your UGI Gas Bill

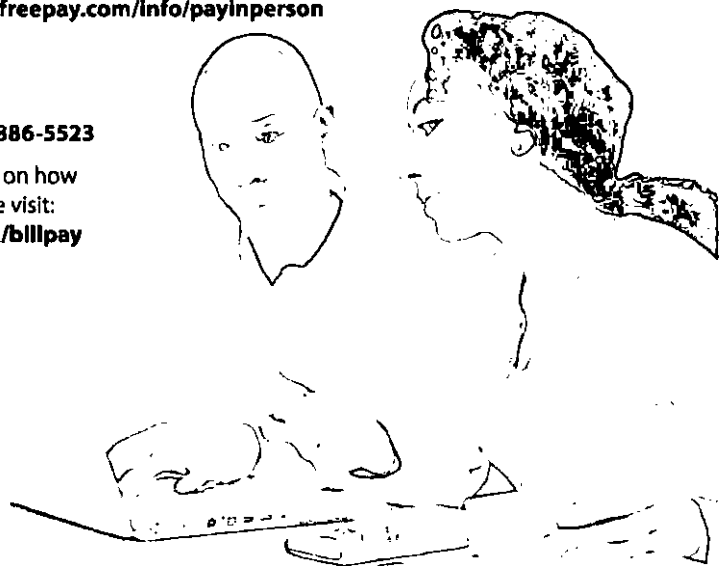
At UGI, we understand our customers want to be able to view and pay their energy bill with ease. That is why we offer our customers a variety of payment options.

- **eBill:** Our online billing option allows you to view, download and print your bill at your own convenience for free. You can receive an email notification when your bill is ready to be viewed, view previous bills from up to 2 years, and print or view your bill 24/7. Once enrolled, you will no longer receive a paper bill, no longer need to write checks or pay stamps, and your payments will post in less time.
- **Budget Billing:** UGI estimates a customer's annual usage and spreads the amount evenly over the Budget Billing Plan period to calculate the monthly bill amount. The monthly Budget Billing payment may be adjusted every three months to keep the payment in line with the actual energy usage. This is a great plan for anyone whose gas or electric usage varies widely from month to month or is seasonal.
- **Automatic Deduction (ABC):** This plan allows you to have your UGI bill amount automatically transferred from your Checking or Savings account each month. Your bank will transfer the exact amount of your UGI bill on the due date of the bill each month so you will never have any late charges, and you can see how much was deducted on your monthly UGI statement as a record of your payment.
- **Customer Assistance:** Programs are available to assist any eligible customers in paying their utility bills. These programs include the Customer Assistance Program (CAP), Low Income Usage Reduction Program (LIURP), Operation Share, Customer Assistance and Referral Evaluation Services (CARES), and Low-Income Home Energy Assistance Program (LIHEAP). You can find all the programs you are eligible by entering the number of people that live in your house or apartment and the total annual income for each person at <http://www.ugi.com/customerassistance>.

For customers who like to pay in more traditional ways may:

- Call UGI by telephone (need account number): **(877) 503-2956**
- Use third party site to pay in person:
<https://www.checkfreepay.com/info/payinperson>
- Mail bill payment to:
UGI Utilities, Inc.
P.O. Box 15523
Wilmington, DE 19886-5523

For more information on how to pay your bill, please visit:
<http://www.ugi.com/billpay>





UGI, Firefighters, Join Red Cross in MLK Day Fire Prevention Outreach

To commemorate and celebrate the service ideals of Martin Luther King, Jr., UGI observed the national holiday named in his honor by partnering with the American Red Cross on a critical, life-saving program. On Monday, January 18th, 35 employees based in UGI offices located in Berks and Luzerne Counties volunteered to join the American Red Cross and local firefighters to install smoke detectors and assist families in developing emergency exit plans in homes located in Reading and Wilkes-Barre. The event was part of the American Red Cross Home Fire Preparedness Campaign, which aims to reduce deaths and injuries caused by home fires by 25% nationally by 2020. In 2015, UGI committed \$100,000 in funding to support this program in communities located across the Company's service territory.



On Martin Luther King Day, teams of volunteers visited residences in neighborhoods with a heightened risk of home fires and installed smoke detectors or replaced batteries as needed. In addition, residents were provided with home fire prevention tips and provided with assistance in creating escape plans in the event a fire occurred within their home.

The Martin Luther King Day event is the latest in a series of UGI collaborative efforts with the American Red Cross in promoting the Fire Prevention Program. UGI is pleased and honored to work side-by-side with the American Red Cross to save lives in our communities.

UGI Urges Residents to Remain Vigilant Regarding Carbon Monoxide

As colder weather blankets the region and residents turn up their thermostats, UGI urges customers to be aware of the dangers of carbon monoxide (CO) and to take steps to avoid a build-up of CO inside their homes and work spaces.

UGI recommends residents follow these basic steps:

- Ensure that natural gas appliances are properly maintained. A malfunctioning furnace, boiler, water heater or stove can emit CO into a home. In addition, restricted or damaged ventilation or exhaust equipment, including a blocked chimney, can produce high levels of CO.
- Make sure smoke and carbon monoxide detectors are installed inside the home or workspace, are working properly, and have fresh batteries. CO detectors/alarms should be located on each floor of a home, especially near every separate sleeping area.
- Check to make sure that both internal and external vents are free from obstructions such as clothing and furniture inside; and dirt, snow or ice outside.

- Ensure that equipment rooms or utility spaces are properly sized and provide appropriate levels of ventilation and air circulation around heating equipment and appliances to ensure safe operation.

UGI also urges residents to be aware of the signs of CO in their homes. Carbon monoxide is a colorless, odorless, poisonous gas that is a by-product of the improper combustion of fuels such as wood, charcoal, gasoline, kerosene, oil, natural gas and propane. Symptoms of CO poisoning include headache, fatigue, shortness of breath, nausea and dizziness. Physical signs within a home that an appliance may be malfunctioning and producing CO include condensation on walls and windows, house plants dying, house pets becoming sluggish, chronic odors from a malfunctioning appliance and residents in the home suffering flu-like symptoms or feeling unusually tired.

CO poisoning can be fatal. Individuals who think they might be experiencing symptoms of CO poisoning should immediately seek fresh air and prompt medical attention.

We Are Here to Help!

Please call **1-800-276-2722** for emergencies and select option 1 (available 24/7).

Para informar de un escape de gas u olor, por favor llame al 1-800-276-2722 y seleccione la opción 1 (disponibles 24/7).

For non-emergency requests, you may call 1-800-276-2722 weekdays from 8 a.m. to 5 p.m.

To pay your bill online and learn more about natural gas, please visit: www.ugi.com.



Energy to do more®



UGI's **Customer Assistance Program (CAP)** offers qualified, income-eligible customers a more manageable monthly energy bill. UGI provides CAP participants with a personalized, monthly payment amount based on gross income, household size and energy usage at the property. In most cases this program makes UGI bills more affordable. Over time, following consistent program payments, participants' past debt to UGI can be forgiven. When CAP bills are paid on or before due date, the difference between the amount billed and the actual amount used may be forgiven. UGI partners with several agencies to provide this useful program to its customers.



Apply For Assistance

Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP (Low Income Home Energy Assistance Program) is a federally funded program administered by each state that helps low income households pay their heating bills through energy assistance grants. Generally, the LIHEAP program begins in the fall. There are two components to the LIHEAP program: CASH and CRISIS. If eligible, a customer must apply every year for this assistance.

CASH COMPONENT: To be eligible for a cash grant, a customer must be responsible for home heating costs. CASH grants are payments that are applied directly to your UGI account. This is not a loan and the money does not have to be paid back.

CRISIS COMPONENT: Additional money is available through a crisis grant. CRISIS grants help families who are in danger of being without heat.

Situations include:

- Having utility services shut-off
- Active termination notice
- Broken heating equipment
- Leaking fuel lines

Homeowners or renters whose gross annual income meets the income guidelines established for the program by the State are eligible.

To apply, a customer must have the names, Social Security numbers, proof of income for all household members and a recent heating bill.

For more information regarding this program, customers can contact UGI or their local County Assistance Office.



C.A.R.E.S. Program

CUSTOMER ASSISTANCE REFERRALS EVALUATION SERVICES (C.A.R.E.S.)

C.A.R.E.S. is a program that can provide referrals to other helpful programs in your community. UGI will send any customer regardless of income a Customer Assistance Guide and energy related information specifically for their area. These programs can include the Low Income Home Energy Assistance Program (LIHEAP), budget counseling, state Weatherization or Office of Aging programs.

ELIGIBILITY CRITERIA

- Residential customer
- Customers experiencing a temporary personal or financial crisis

Additional Services offered by UGI:

- Conservation Literature
- Gift Credits
- Third Party Notification
- Extended Due Date
- Online Bill Pay
- Budget Billing
- Payment Arrangements



Universal Service Programs

For more information please call:
1-800-UGI-WARM
1-800-844-9276



1-800-UGI-WARM (1-800-844-9276)

Customer Assistance Program (CAP)

UGI's Customer Assistance Program (CAP) offers qualified, low income customers a more manageable monthly energy bill. UGI provides CAP participants with a personalized, monthly payment amount based on gross income, household size and energy usage at the property. In most cases this program makes UGI bills more affordable. Over time, following consistent program payments, participants' past debt to UGI can be forgiven. UGI partners with several agencies to provide this useful program to its customers.

ELIGIBILITY CRITERIA

- Customer must have an active residential account
- The property must be the customer's only residence
- Gross Annual Income must be at or below 150% of the Federal Poverty Level:

Household Size	150% FPL Household Income
1	\$17,655
2	\$23,895
3	\$30,135
4	\$36,375
5	\$42,615
6	\$48,855
7	\$55,095
For each addition person add:	\$6,240



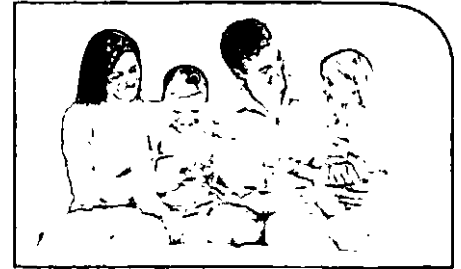
Low Income Usage Reduction Program

UGI's LIURP offers free weatherization measures to low-income residential heating customers in order to limit heat loss and provide long-term energy savings. These energy savings measures may include window and baseboard caulking, door and window weather-stripping, attic and sidewall insulation, duct and pipe insulation, ventilation, water conservation devices, furnace inspection and energy education.

In addition, non-heating UGI Electric accounts may qualify for measures such as refrigerator replacement and high efficiency lighting.

ELIGIBILITY CRITERIA

- An active UGI gas or electric heating account with twelve (12) or more continuous billing periods for the same account number
- Higher than average gas or electric heating usage during the twelve month period to meet specified consumption levels for the program
- Renters can qualify with written permission from landlords
- Gross Annual Income at or below 150% of Federal Poverty Level (See CAP Income Guidelines)
- A percentage of customers who may have extenuating circumstances can be accepted at 200% of Federal Poverty Level (See Operation Share Income Guidelines)



Operation Share

The Operation Share program provides energy assistance grants to qualified customers who experience difficulty paying their heating bills. This community-based program is funded by voluntary donations from UGI employees, UGI customers and concerned citizens. In addition, UGI provides a corporate donation to help fund the program.

ELIGIBILITY CRITERIA

- The customer must have an active UGI account
- The customer's gross income must be at or below 200% of Federal Poverty Level
- This grant may be received one time per twelve (12) month period

Household Size	200% FPL Household Income
1	\$23,540
2	\$31,860
3	\$40,180
4	\$48,500
5	\$56,820
6	\$65,140
7	\$73,460
For each addition person add:	\$8,320

Response of UGI to CAUSE-PA I-14

Question 14 (Prepared by Robert Stoyko)

Please provide a copy of the reports or, if not in report form, the data, submitted to the PUC Bureau of Consumer Services in compliance with Universal Services reporting requirements of 52 Pa Code § 62.5 for the last three years.

Response:

Please see Attachments CAUSE-PA-I-14-1, 14-2, and 14-3.

Attachment File Name	Attachment Note
CAUSE-PA I-14-1.pdf	
CAUSE-PA I-14-2.pdf	
CAUSE-PA I-14-3.pdf	

UGI GAS Collection	2014 All Residential	2014 Confirmed Low Income
1. Total Number(#) - Payment Arrangements	35,080	29,896
2. Total Number(#) - Successful Payment Arrangements	12,611	9,321
(#2 must be less than #1)		
3. Annual Collection Operating Expenses (\$)	\$2,568,308	\$1,279,017
4. Total Dollar Amount(\$) <i>Gross Residential Write-Offs</i>	\$7,052,238	\$4,607,873
5. Total Dollar Amount(\$) <i>Net Residential Write-offs</i>	\$5,998,569	\$3,622,816
6. Total Number(#) Residential Customers - By Month:		
January	330,143	39,607
February	331,118	40,633
March	332,265	41,837
April	331,971	41,677
May	330,888	41,841
June	330,638	41,946
July	329,893	41,623
August	329,845	41,232
September	330,023	41,305
October	331,700	42,147
November	334,709	42,835
December	335,801	42,979
	3,978,994	499,662
	331,583	41,639
7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,365	1,731
February	4,016	3,082
March	5883	4,903
April	7837	6546
May	9003	7472
June	9512	8051
July	7951	7043
August	7217	6395
September	6758	6012
October	4759	4389
November	3814	3556
December	3122	1847
(#7A must be less than #6)	72,237	61,027
	6,020	5,086
7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	29,487	13,172
February	27,293	12,387
March	29551	12,719
April	28089	11,336
May	29540	11,332
June	28702	10,820
July	27006	10764
August	25549	10,112
September	24192	9,396
October	21490	10,182
November	23664	10,297
December	25883	12,070
(#7b must be less than #6)	320,446	134,587
	26,704	11,216

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$849,270	645,085
February	\$1,811,927	1,415,088
March	\$3,067,538	\$2,654,548
April	\$4,756,768	\$4,077,646
May	\$4,999,739	\$4,298,559
June	\$4,679,106	\$4,112,544
July	\$3,463,618	\$3,163,596
August	\$2,831,486	\$2,579,281
September	\$2,322,516	\$2,130,609
October	\$1,507,310	\$1,423,619
November	\$1,180,062	\$1,117,205
December	\$722,126	\$639,617
(Sum of #8a must be less than sum of #12b)	\$ 32,191,466	\$ 28,257,396
	\$ 2,682,622	\$ 2,354,783
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	8,419,352	5,034,696
February	9,992,520	6,018,733
March	\$12,220,643	\$7,055,596
April	\$11,111,582	\$5,881,216
May	\$9,902,479	\$5,180,165
June	\$7,789,365	\$4,220,951
July	\$6,547,879	\$3,785,145
August	\$5,363,638	\$3,154,033
September	\$4,029,708	\$2,411,057
October	\$3,895,300	\$2,497,233
November	\$3,954,200	\$2,600,843
December	\$5,697,936	\$3,786,536
(sum of #8b must be less than 12b)	\$ 88,924,601	\$51,626,203
	\$ 7,410,383	\$4,302,184
9. Total Number(#) Residential Payment Troubled Customers - By Month:		
January	10319	9192
February	10578	9417
March	11208	9921
April	11407	9927
May	12244	10515
June	12690	10958
July	13022	11231
August	12560	10862
September	12047	10513
October	11855	10395
November	11541	10215
December	11373	10073
(#9 must be less than #6)	140,844	123,219
	11,737	10,268

10. Total Number(#) Terminations - By Month:		
January	0	0
February	0	0
March	0	0
April	1,845	1,370
May	1,800	1,225
June	1,953	1,335
July	1,664	1,284
August	1,465	1,109
September	1,761	1,216
October	595	433
November	66	46
December	0	0
(Must be less than #6 each month)	11,149	8,018
	929	668

11. Total Number(#) Reconnections - By Month:		
January	18	5
February	9	3
March	4	1
April	389	277
May	597	375
June	629	401
July	584	364
August	602	394
September	987	614
October	768	443
November	523	299
December	130	66
(must be less than #6 in each month)	5,240	3,242
	437	270

12. Total Number(#) Low Income Households (Accounts) (Estimated)	84,809
(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document	

12B. Annual Residential Revenues (\$)	\$ 231,393,035	\$ 35,997,461
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Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - LIURP	2014
13. Program Costs (\$)/Actual Spending for the Year Just Completed	529,676
14. Number of Family Members Under Age 18	1.57
15. Number of Family Members Over Age 62	0.32
16. Family Size	3.6
17. Income (\$)	19,734
18. Source of Income	
Employment	33
Public Assistance	8
Pension/Retirement	18
Unemployment Compensation	2
Disability	18
Other (includes Missing Data)	9

19. Participation Levels By Month (#) - Reporting Year:	
Heating Jobs:	
January	2
February	3
March	12
April	11
May	9
June	6
July	3
August	6
September	11
October	6
November	5
December	14
	<i>total</i> 88
Water Heating Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Baseload Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
20. Projected Spending for the Current Year - (\$)	
	796,100
21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	114
Water Heating Jobs	0
Baseload Jobs	0
22. Average Job Costs (\$)	
Heating Jobs	4,919
Water Heating Jobs	0
Baseload Jobs	0

22.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	88
Other	0

22.B. Participants in Multiple Programs: (gas industry only)	
LIURP and CAP	59
LIURP and CARES	0
LIURP and Hardship Fund	13
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	9
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - CAP	2014
23. Program Costs - Administration (\$)	\$262,306
24. Program Costs - CAP Credits (\$)	\$1,542,948
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$677,204
Program Costs - CAP Accounts in Arrears - (\$):	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
Program Costs - CAP Accounts in Arrears - (#):	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.5
29. Number of Family Members Over Age 62	0.17
30. Family Size	3.0
31. Income (\$)	\$ 13,475

32. Source of Income	
Employment	2,809
Public Assistance	1,074
Pension/Retirement	401
Unemployment Compensation	347
Disability	1,691
Other (includes Missing Data)	715
	7,037

33. Participation Levels By Month - Income at or below 50% of Poverty (#):	
January	2,041
February	2,151
March	2,235
April	2,311
May	2,435
June	2,528
July	2,531
August	2,519
September	2,514
October	2,501
November	2,460
December	2,431

2,388

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	2,311
February	2,547
March	2,783
April	3,008
May	3,328
June	3,526
July	3,605
August	3,631
September	3,690
October	3,690
November	3,669
December	3,674
	3,289
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	449
February	549
March	678
April	810
May	1,020
June	1,131
July	1,191
August	1,237
September	1,278
October	1,325
November	1,356
December	1,364
	1,032
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	241
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	350
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	124
39. Participation Level: Exists other than Defaults (#)	1,166
40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,444,504
41. Energy Assistance Benefits (number of cutomers)(#)	4,640
42. Number of Full CAP Payments by Month:	
January	2,400
February	2,706
March	2,995
April	3,958
May	4,046
June	3,830
July	4,373
August	4,469
September	4,764
October	5,376
November	4,661
December	3,951
	47,529
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 5,757,623

44. Total Number of CAP Bills Rendered by Month (#):	
January	4616
February	4490
March	5283
April	5684
May	6101
June	6646
July	7220
August	7155
September	7056
October	7593
November	6279
December	7426
	75549
45. Total Cash Payments by CAP Customers (\$)	\$ 4,348,982
46. Number of Full, On-Time Payments (#):	22,622

46.A. Source of Intake: (gas industry only)	
Distribution Company	1,828
Community-Based Organization	3,039
Other	0

46.B. Participants in Multiple Programs: (gas industry only)	
CAP and LIURP	59
CAP and CARES	3
CAP and Hardship Fund	173
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	9
CAP, CARES and Hardship Fund	2
CAP, LIURP, CARES and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - CARES	2014
47. Program Costs (\$)	\$ 70,002
48. Number of Family Members Under Age 18	1.00
49. Number of Family Members Over Age 62	0.27
50. Family Size	2.83
51. Income (\$)	\$ 17,313

52. Source of Income:	
Employment	12
Public Assistance	3
Pension/Retirement	3
Unemployment Compensation	0
Disability	5
Other (includes Missing Data)	9
	32

53. Participation Levels By Month:	
January	2
February	0
March	1
April	1
May	2
June	0
July	0
August	1
September	3
October	3
November	16
December	3
	32

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$ 2,232
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	10
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$ 5,500
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	11
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$ 2,452,331
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	13,245
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$ 1,094,276
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	3,635
62. Direct Dollars Applied to CARES Accounts (dollars)(\$)	\$ 4,757
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	15
64. CARES Benefits (#) - Number of Customers Referred to CARES	32
65. CARES Benefits (#) - Number of Customers Accepted into CARES	32

65.A. Source of Intake: (gas industry only)	
Distribution Company	32
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	0
CARES and CAP	3
CARES and Hardship Fund	13
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	2
Cares, LIURP, CAP and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - Hardship Fund	2014
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$0
b. Administrative Costs from Shareholders (\$)	\$6,520
67. Number of Family Members Under Age 18	1.49
68. Number of Family Members Over Age 62	0.13
69. Family Size	3.2
70. Income (\$)	\$19,052.04

71. Source of Income:	
Employment	371
Public Assistance	15
Pension/Retirement	31
Unemployment Compensation	36
Disability	144
Other (includes Missing Data)	55

72. Participation Levels By Month (#):	
Nov	52
Dec	35
Jan	33
Feb	32
Mar	10
Apr	6
May	44
June	86
July	25
Aug	29
Sept	204
Oct	96
total	652
73. Ratepayer/Employee Contributions (\$)	\$82,934
74. Special Contributions (\$):	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0
75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)	\$ 40,000.00
76. Utility Contributions (\$) - (excluding #66 and #75)	\$16,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	\$ 16,000.00
78. Outreach Contacts (Name of Agency, Address and Telephone # by County)	
(This is a separate list)	
Hardship Fund Benefits:	
79. Cash Benefits (number of grants)(#)	652
80. Cash Benefits (dollars in grants)(\$)	\$146,199.85
80.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	652
Other	0
80.B. Participants in Multiple Programs: (gas industry only)	
Hardship Fund and LIURP	13
Hardship Fund and CAP	173
Hardship Fund and CARES	13
Hardship Fund, LIURP and CAP	9
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	2
Hardship Fund, LIURP, CAP and CARES	0

UGI GAS Collection	2013 All Residential	2013 Confirmed Low Income
1. Total Number(#) - Payment Arrangements	29,063	24,416
2. Total Number(#) - Successful Payment Arrangements (#2 must be less than #1)	13,739	10,313
3. Annual Collection Operating Expenses (\$)	\$2,264,783	\$1,902,418
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$4,756,334	\$3,685,628
5. Total Dollar Amount(\$) Net Residential Write-offs	\$3,816,148	\$3,168,542
6. Total Number(#) Residential Customers - By Month:		
January	322,532	39,178
February	323,755	40,295
March	324,571	41,119
April	324,635	40,768
May	323,648	40,797
June	323,839	40,546
July	323,287	39,973
August	323,152	38,527
September	323,409	38,056
October	325,130	38,280
November	328,008	38,550
December	328,946	38,760
	3,894,912	474,849
	324,576	39,571

7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,242	1,461
February	3,001	2,247
March	5342	4,554
April	7071	5996
May	7564	6411
June	7337	6453
July	6684	5977
August	6139	5461
September	5150	4723
October	3964	3664
November	2842	2618
December	1743	1493
(#7A must be less than #6)	59,079	51,058
	4,923	4,255

7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	23,296	11,203
February	22,074	11,032
March	21834	9,730
April	22778	9,407
May	25233	10,401
June	25790	10,668
July	24910	10504
August	23790	10,039
September	25516	10,055
October	25557	10,029
November	26510	10,665
December	28045	12,177
(#7b must be less than #6)	295,333	125,910
	24,611	10,493

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$659,251	457,664
February	\$1,101,076	867,249
March	\$2,512,007	\$2,208,152
April	\$3,486,414	\$3,072,151
May	\$3,464,020	\$3,064,510
June	\$3,035,287	\$2,773,330
July	\$2,467,700	\$2,288,401
August	\$2,010,346	\$1,841,099
September	\$1,532,906	\$1,445,648
October	\$1,103,136	\$1,041,044
November	\$741,654	\$701,377
December	\$510,416	\$457,115
(Sum of #8a must be less than sum of #12b)	\$ 22,624,212	\$ 20,217,740
	\$ 1,885,351	\$ 1,684,812

8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	5,491,314	3,513,692
February	6,565,477	4,326,951
March	\$6,835,134	\$3,948,347
April	\$6,696,212	\$3,575,989
May	\$6,635,950	\$3,589,037
June	\$5,822,405	\$3,235,600
July	\$4,896,856	\$2,842,781
August	\$3,985,502	\$2,408,625
September	\$3,622,215	\$2,156,052
October	\$3,484,590	\$2,079,008
November	\$3,890,963	\$2,440,568
December	\$5,660,873	\$3,488,332
(sum of #8b must be less than 12b)	\$ 63,587,490	\$37,604,982
	\$ 5,298,958	\$3,133,749

9. Total Number(#) Residential Payment Troubled Customers By Month:		
January	8472	7425
February	8929	7842
March	9419	8253
April	9678	8461
May	10618	9222
June	11104	9608
July	11221	9754
August	11065	9717
September	10988	9685
October	10756	9531
November	10494	9365
December	10328	9223
(#9 must be less than #6)	123,072	108,086
	10,256	9,007

10. Total Number(#) Terminations - By Month:		
January	26	0
February	21	0
March	20	2
April	2,177	1,625
May	1,485	1,049
June	1,294	955
July	1,302	1,032
August	1,329	954
September	892	670
October	486	381
November	22	6
December	1	0
(Must be less than #6 each month)	9,055	6,674
	755	556

11. Total Number(#) Reconnections - By Month:		
January	29	9
February	25	4
March	6	4
April	636	459
May	638	425
June	419	272
July	427	283
August	530	358
September	554	397
October	585	350
November	373	228
December	100	43
(must be less than #6 in each month)	4,322	2,832
	360	236

12. Total Number(#) Low Income Households (Accounts) (Estimated)	68,043
(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document	

12B. Annual Residential Revenues (\$)	\$ 219,614,215	\$ 31,883,003
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Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - LIURP	2013
13. Program Costs (\$)/Actual Spending for the Year Just Completed	438,032
14. Number of Family Members Under Age 18	1.56
15. Number of Family Members Over Age 62	0.16
16. Family Size	3.24
17. Income (\$)	19,353

18. Source of Income	
Employment	30
Public Assistance	5
Pension/Retirement	8
Unemployment Compensation	5
Disability	22
Other (includes Missing Data)	8

19. Participation Levels By Month (#) - Reporting Year:	
Heating Jobs:	
January	6
February	4
March	8
April	7
May	7
June	7
July	11
August	10
September	3
October	4
November	5
December	6
	<i>total</i>
	78

Water Heating Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

Baseload Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

20. Projected Spending for the Current Year - (\$)	660,224
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21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	94
Water Heating Jobs	0
Baseload Jobs	0

22. Average Job Costs (\$)	
Heating Jobs	4,330
Water Heating Jobs	0
Baseload Jobs	0

22.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	78
Other	0

22.B. Participants in Multiple Programs: (gas industry only)	
LIURP and CAP	47
LIURP and CARES	0
LIURP and Hardship Fund	3
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	3
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - CAP	2013
23. Program Costs - Administration (\$)	\$186,832
24. Program Costs - CAP Credits (\$)	\$2,237,901
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$751,379
Program Costs - CAP Accounts in Arrears - (\$):	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
Program Costs - CAP Accounts in Arrears - (#):	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.47
29. Number of Family Members Over Age 62	0.17
30. Family Size	3.0
31. Income (\$)	\$ 11,365

32. Source of Income	
Employment	1,510
Public Assistance	316
Pension/Retirement	716
Unemployment Compensation	301
Disability	1,174
Other (includes Missing Data)	618
	4,635

33. Participation Levels By Month - Income at or below 50% of Poverty (#):	
January	2,008
February	2,088
March	2,122
April	2,225
May	2,261
June	2,264
July	2,253
August	2,217
September	2,162
October	2,111
November	2,048
December	2,010
	2,147

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	2,447
February	2,384
March	2,416
April	2,516
May	2,540
June	2,462
July	2,403
August	2,352
September	2,300
October	2,204
November	2,144
December	2,140
	2,359

35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	396
February	349
March	362
April	381
May	395
June	358
July	348
August	339
September	328
October	313
November	318
December	341
	352

36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	291
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	388
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	103
39. Participation Level: Exists other than Defaults (#)	2,020

40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,034,459
41. Energy Assistance Benefits (number of customers)(#)	3,390
42. Number of Full CAP Payments by Month:	
January	2,671
February	2,798
March	2,734
April	3,179
May	3,382
June	2,739
July	3,237
August	3,125
September	3,438
October	3,278
November	2,851
December	2,460
	35,892
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 4,277,500

44. Total Number of CAP Bills Rendered by Month (#):	
January	4897
February	4331
March	4364
April	5183
May	5179
June	4796
July	5097
August	4882
September	4471
October	4782
November	4158
December	4419
	56559
45. Total Cash Payments by CAP Customers (\$)	\$ 3,215,169
46. Number of Full, On-Time Payments (#):	18,527

46.A. Source of Intake: (gas industry only)	
Distribution Company	813
Community-Based Organization	1,451
Other	0

46.B. Participants in Multiple Programs: (gas industry only)	
CAP and LIURP	47
CAP and CARES	3
CAP and Hardship Fund	146
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	6
CAP, CARES and Hardship Fund	1
CAP, LIURP, CARES and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - CARES	
47. Program Costs (\$)	2013 \$74,041
48. Number of Family Members Under Age 18	0.5
49. Number of Family Members Over Age 62	0.42
50. Family Size	1.64
51. Income (\$)	\$10,603

52. Source of Income:	
Employment	4
Public Assistance	0
Pension/Retirement	4
Unemployment Compensation	0
Disability	1
Other (includes Missing Data)	5
	14

53. Participation Levels By Month:	
January	0
February	2
March	4
April	4
May	0
June	2
July	0
August	0
September	1
October	1
November	0
December	0

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$1,116
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	7
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$65
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	1
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$2,883,726
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	15,851
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$611,326
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	2,066
62. Direct Dollars Applied to CARES Accounts (dollars)(CARES)	\$1,963
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	10
64. CARES Benefits (#) - Number of Customers Referred to CARES	14
65. CARES Benefits (#) - Number of Customers Accepted into CARES	14

65.A. Source of Intake: (gas industry only)	
Distribution Company	14
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	0
CARES and CAP	3
CARES and Hardship Fund	1
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	1
Cares, LIURP, CAP and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - Hardship Fund	2013
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$0
b. Administrative Costs from Shareholders (\$)	\$6,540
67. Number of Family Members Under Age 18	1.55
68. Number of Family Members Over Age 62	0.14
69. Family Size	3.18
70. Income (\$)	\$17,282.00

71. Source of Income:	
Employment	299
Public Assistance	16
Pension/Retirement	26
Unemployment Compensation	61
Disability	177
Other (includes Missing Data)	77

72. Participation Levels By Month (#):	
Nov	90
Dec	76
Jan	45
Feb	121
Mar	31
Apr	13
May	68
June	33
July	28
Aug	80
Sept	59
Oct	12
total	656

73. Ratepayer/Employee Contributions (\$)	\$72,705
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74. Special Contributions (\$):	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0

75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)	\$ 40,000.00
76. Utility Contributions (\$) - (excluding #66 and #75)	\$16,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	\$ 16,000.00

78. Outreach Contacts (Name of Agency, Address and Telephone # by County) (This is a separate list)	
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Hardship Fund Benefits:	
79. Cash Benefits (number of grants)(#)	656
80. Cash Benefits (dollars in grants)(\$)	\$178,752.00
80.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	656
Other	0

80.B. Participants in Multiple Programs: (gas industry only)	
Hardship Fund and LIURP	11
Hardship Fund and CAP	164
Hardship Fund and CARES	1
Hardship Fund, LIURP and CAP	6
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	1
Hardship Fund, LIURP, CAP and CARES	0

UGI GAS Collection	2012 All Residential	2012 Confirmed Low Income
1. Total Number(#) - Payment Arrangements	36,894	30,023
2. Total Number(#) - Successful Payment Arrangements <i>(#2 must be less than #1)</i>	15,098	10,447
3. Annual Collection Operating Expenses (\$)	\$2,734,654	\$1,886,912
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$4,885,688	\$4,107,602
5. Total Dollar Amount(\$) Net Residential Write-offs	\$3,467,478	\$3,503,211
6. Total Number(#) Residential Customers - By Month:		
January	315,064	39,363
February	316,137	40,323
March	316,874	41,349
April	317,320	41,085
May	316,261	40,764
June	316,315	40,067
July	315,772	39,427
August	315,972	38,730
September	316,572	37,738
October	318,071	37,839
November	320,384	38,215
December	321,294	38,465
	3,806,036	473,365
	317,170	39,447
7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,293	1,621
February	3,419	2,658
March	5332	4,503
April	6368	5301
May	6074	5255
June	5556	4859
July	4795	4321
August	3662	3265
September	3067	2744
October	3081	2697
November	1924	1642
December	1548	1196
<i>(#7A must be less than #6)</i>	47,119	40,062
	3,927	3,339
7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	23,675	10,480
February	19,842	9,005
March	20599	8,480
April	22697	9,047
May	22409	9,023
June	22748	9,216
July	22932	9,279
August	21543	8,597
September	21584	8,502
October	19740	7,619
November	21430	8,777
December	24521	10,288
<i>(#7b must be less than #6)</i>	263,720	108,313
	21,977	9,026

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$768,990	582,837
February	\$1,430,549	1,165,561
March	\$2,505,055	\$2,189,548
April	\$2,762,596	\$2,411,036
May	\$2,375,666	\$2,132,795
June	\$1,926,228	\$1,748,709
July	\$1,504,655	\$1,399,704
August	\$1,070,110	\$987,926
September	\$873,708	\$808,070
October	\$800,582	\$726,149
November	\$492,317	\$447,128
December	\$416,154	\$343,043
(Sum of #8a must be less than sum of #12b)	\$ 16,926,610	\$ 14,942,506
	\$ 1,410,551	\$ 1,245,209

8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	5,614,367	3,427,060
February	5,970,836	3,690,301
March	\$6,169,017	\$3,456,277
April	\$5,485,843	\$2,947,128
May	\$4,839,973	\$2,621,630
June	\$4,147,051	\$2,328,925
July	\$3,532,339	\$2,008,931
August	\$2,958,123	\$1,692,975
September	\$2,662,413	\$1,514,770
October	\$2,169,211	\$1,225,709
November	\$2,669,845	\$1,599,672
December	\$4,002,396	\$2,391,805
(sum of #8b must be less than 12b)	\$ 50,221,414	\$28,905,183
	\$ 4,185,118	\$2,408,765

9. Total Number(#) Residential Payment Troubled Customers - By Month:		
January	9091	7733
February	9348	7933
March	10142	8745
April	10186	8798
May	10470	9013
June	10337	8916
July	9868	8613
August	9143	8033
September	8711	7682
October	8183	7263
November	8102	7180
December	8073	7127
(#9 must be less than #6)	111,654	97,036
	9,305	8,086

10. Total Number(#) Terminations - By Month:		
January	8	0
February	13	0
March	6	3
April	1,819	1,368
May	1,484	1,092
June	1,470	1,125
July	1,346	1,056
August	977	767
September	590	460
October	512	397
November	201	159
December	8	2
(Must be less than #6 each month)	8,434	6,429
	703	536

11. Total Number(#) Reconnections - By Month:		
January	30	9
February	30	15
March	9	3
April	412	273
May	585	409
June	471	338
July	528	376
August	495	374
September	414	300
October	587	373
November	371	217
December	58	31
(must be less than #6 in each month)	3,990	2,718
	333	227

12. Total Number(#) Low Income Households (Accounts) (Estimated)	68,043
(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document	

12B. Annual Residential Revenues (\$)	\$ 196,428,979	\$ 30,969,383
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Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - LIURP	2012
13. Program Costs (\$)/Actual Spending for the Year Just Completed	797,306
14. Number of Family Members Under Age 18	1.63
15. Number of Family Members Over Age 62	0.16
16. Family Size	3.41
17. Income (\$)	18,954

18. Source of Income	
Employment	60
Public Assistance	7
Pension/Retirement	9
Unemployment Compensation	8
Disability	33
Other (includes Missing Data)	15

19. Participation Levels By Month (#) - Reporting Year:	
Heating Jobs:	
January	4
February	6
March	14
April	24
May	15
June	13
July	10
August	7
September	3
October	5
November	12
December	19
<i>total</i>	132

Water Heating Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

Baseload Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

20. Projected Spending for the Current Year - (\$)	483,664
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21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	69
Water Heating Jobs	0
Baseload Jobs	0

22. Average Job Costs (\$)	
Heating Jobs	4,991
Water Heating Jobs	0
Baseload Jobs	0

22.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	132
Other	0

22.B. Participants in Multiple Programs: (gas industry only)	
LIURP and CAP	84
LIURP and CARES	0
LIURP and Hardship Fund	9
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	2
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - CAP	2012
23. Program Costs - Administration (\$)	\$196,945
24. Program Costs - CAP Credits (\$)	\$1,985,450
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$480,384
Program Costs - CAP Accounts in Arrears - (\$):	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
Program Costs - CAP Accounts in Arrears - (#):	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.38
29. Number of Family Members Over Age 62	0.18
30. Family Size	3.0
31. Income (\$)	\$ 10,472

32. Source of Income	
Employment	1,246
Public Assistance	929
Pension/Retirement	385
Unemployment Compensation	285
Disability	854
Other (includes Missing Data)	591
	4,290

33. Participation Levels By Month - Income at or below 50% of Poverty (#):	
January	2,438
February	2,437
March	2,464
April	2,443
May	2,393
June	2,347
July	2,287
August	2,225
September	2,172
October	2,130
November	2,090
December	2,041
	2,289

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	3,419
February	3,423
March	3,498
April	3,503
May	3,471
June	3,386
July	3,304
August	3,138
September	3,032
October	2,855
November	2,707
December	2,568
	3,192

35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	757
February	770
March	781
April	781
May	735
June	692
July	677
August	622
September	588
October	528
November	485
December	432
	654

36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	645
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	1,453
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	646
39. Participation Level: Exists other than Defaults (#)	920

40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,416,047
41. Energy Assistance Benefits (number of cutomers)(#)	4,252
42. Number of Full CAP Payments by Month:	
January	3,462
February	4,011
March	4,769
April	6,597
May	4,391
June	3,438
July	3,911
August	5,571
September	2,114
October	2,515
November	2,824
December	2,649
	46,252
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 6,066,566

44. Total Number of CAP Bills Rendered by Month (#):	
January	6542
February	6215
March	6815
April	6471
May	6709
June	6351
July	6109
August	6168
September	5129
October	5788
November	4935
December	4821
	72053
45. Total Cash Payments by CAP Customers (\$)	\$ 4,492,585
46. Number of Full, On-Time Payments (#):	21,089

46.A. Source of Intake: (gas industry only)	
Distribution Company	725
Community-Based Organization	1,325
Other	0

46.B. Participants in Multiple Programs: (gas industry only)	
CAP and LIURP	84
CAP and CARES	6
CAP and Hardship Fund	124
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	2
CAP, CARES and Hardship Fund	0
CAP, LIURP, CARES and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - CARES	2012
47. Program Costs (\$)	\$63,536
48. Number of Family Members Under Age 18	1.5
49. Number of Family Members Over Age 62	0.33
50. Family Size	3.05
51. Income (\$)	\$12,960

52. Source of Income:	
Employment	4
Public Assistance	1
Pension/Retirement	3
Unemployment Compensation	0
Disability	4
Other (includes Missing Data)	6
	18

53. Participation Levels By Month:	
January	0
February	0
March	0
April	1
May	1
June	0
July	8
August	1
September	2
October	1
November	3
December	1

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$605
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	5
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$449
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	2
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$4,604,937
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	28,395
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$434,222
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	1,798
62. Direct Dollars Applied to CARES Accounts (dollars)(\$)	\$2,546
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	11
64. CARES Benefits (#) - Number of Customers Referred to CARES	18
65. CARES Benefits (#) - Number of Customers Accepted into CARES	18

65.A. Source of Intake: (gas industry only)	
Distribution Company	18
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	1
CARES and CAP	6
CARES and Hardship Fund	2
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	1
CARES, CAP and Hardship Fund	0
Cares, LIURP, CAP and Hardship Fund	0

Universal Service Reporting Requirements - Input Document

UGI GAS - Hardship Fund	2012
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$8,800
b. Administrative Costs from Shareholders (\$)	\$0
67. Number of Family Members Under Age 18	1.49
68. Number of Family Members Over Age 62	0.11
69. Family Size	3.12
70. Income (\$)	\$17,543.00

71. Source of Income:	
Employment	388
Public Assistance	48
Pension/Retirement	26
Unemployment Compensation	87
Disability	191
Other (includes Missing Data)	93

72. Participation Levels By Month (#):	
Nov	55
Dec	71
Jan	52
Feb	73
Mar	100
Apr	88
May	86
June	83
July	78
Aug	73
Sept	44
Oct	30
total	833
73. Ratepayer/Employee Contributions (\$)	
	\$87,185
74. Special Contributions (\$):	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	
Other	\$94,549
75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)	
	\$ 40,000.00
76. Utility Contributions (\$) - (excluding #66 and #75)	
	\$16,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	
	\$ 16,000.00
78. Outreach Contacts (Name of Agency, Address and Telephone # by County)	
(This is a separate list)	
Hardship Fund Benefits:	
79. Cash Benefits (number of grants)(#)	
	833
80. Cash Benefits (dollars in grants)(\$)	
	\$255,977.00
80.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	833
Other	0
80.B. Participants in Multiple Programs: (gas Industry only)	
Hardship Fund and LIURP	14
Hardship Fund and CAP	123
Hardship Fund and CARES	0
Hardship Fund, LIURP and CAP	6
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	0
Hardship Fund, LIURP, CAP and CARES	0

Response of UGI to CAUSE-PA I-16

Question 16 (Prepared by Robert Stoyko)

How many CAP customers had their service involuntarily terminated for non-payment of service during the following periods:

- a. December 1, 2012 – March 31, 2013
- b. April 1, 2013 – November 30, 2013
- c. December 1, 2013 – March 31, 2014
- d. April 1, 2014 – November 30, 2014
- e. December 1, 2014 – March 31, 2015
- f. April 1, 2015 – November 30, 2015
- g. December 1, 2015 – the date of this response

Response:

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the CAP status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. 0

f. 1,304

g. 0

No Digital Attachments Found.

Response of UGI to CAUSE-PA I-17

Question 17 (Prepared by Robert Stoyko)

In reference to the terminations identified in CAUSE-PA I-16 (a)-(g), please separately indicate the average number of days and/or months the customers remained without service for each date range.

Response:

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the CAP status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. Not Applicable

f. 45

g. Not Applicable

The data above represents customers restored under the same name as of March 1, 2016.
No Digital Attachments Found.

Response of UGI to CAUSE-PA I-18

Question 18 (Prepared by Robert Stoyko)

How many non-CAP, confirmed low-income customers had their service involuntarily terminated during the periods indicated in CAUSE-PA I-16 (a) – (g), separated by date range?

Response:

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the Low Income status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. 1

f. 5,917

g. 1

The answers in e and g were the result of shut off errors.

No Digital Attachments Found.

Response of UGI to CAUSE-PA I-19

Question 19 (Prepared by Robert Stoyko)

Of the customer terminations listed in response to CAUSE-PA I-18, please identify for each date range:

- a. The average number of days and/or months the customers remained without service;
- b. the number of terminated low-income customers who were referred to CAP; and
- c. the number of terminated low-income customers who were enrolled in CAP.

Response:

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the Low Income status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

a. This response refers to CAUSE-PA-I-18 for the following subsections:

e. Not applicable as service was restored under a new party.

f. 50

g. Service is not restored. UGI attempts at contact are unanswered. The property appears vacant.

b. Not applicable. Customers are solicited for CAP prior to the termination.

c. Not applicable. CAP solicits and enrollments would occur only upon successful restoration.

The data in answer a.-c. represents customers restored under the same name as of March 1, 2016.

No Digital Attachments Found.

Response of UGI to CAUSE-PA II-4

Question 4 (Prepared by Robert Stoyko)

Please provide a list of all trainings conducted in the last five years for each contractor listed in response to CAUSE-PA I-25, and indicate the date and location of the trainings and the time allotted to for each training. Include a detailed agenda for each training and a summary of the substantive topics covered, and indicate whether the training was mandatory for all or some call center employees.

Response:

Upon consultation with CAUSE-PA, the company is providing a response for Calendar Year 2015. Please see Attachment CAUSE-PA II-4.

Attachment File Name	Attachment Note
CAUSE-PA II-4.pdf	

Training Date	Agency	Training Location	Allocated Training Time	Attendees	# of Attendees	Training Type	Topics
01/08/15	Call Center Representatives	Reading	2 hours	Call Center Trainee Representatives	2	Outreach Overview	Review of USP and UGI Assistance Programs
1/13/2015	Central PA Comm Action	Webinar	4 Hours	New Caseworker	1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion
1/14/2015	Call Center Representatives	Reading	1.5 hours	Call Center Billing Representatives	6	Operation Share	Review of Operation Share Call Center Training Manual
1/22/2015	Reading Salvation Army	301 S. 5th St. Reading	4 Hours	New Caseworkers	4	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion
2/3/2015	Reading Salvation Army	301 S 5th St Reading	2 Hours	New Caseworkers	2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
2/12/2015	Call Center Representatives	Reading	1.5 hours	Call Center Trainee Representatives	5	Outreach Overview	Review of USP and UGI Assistance Programs
02/19/15	SOLAIRE Energy, Inc	UGI Wilkes Barre Office	5 Hours	New Caseworker	4	Customer Outreach System (COS) LIURP Training	COS: Third Party Processes; Electric Account Processes
2/26/2015	CEO of Hazleton	100 W Broad St, Hazleton	2 Hours	New Caseworkers	1	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
3/3/2015	Project Share of Carlisle	Webinar	2 Hours	New Caseworkers	2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
03/11/15	TREHAB	Webinar	4 Hours		3	LIURP Caseworker Training	LIURP Processes: Intake, Audit, Measure Entry, Job Completion, Customer Follow up
03/18/15	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives	4	Outreach Overview	Review of USP and UGI Assistance Programs
3/20/2015	Hazleton CEO	Webinar	4 Hours		1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion,
03/25/15	All LIURP Caseworkers	UGI Wilkes Barre Office	8 Hours	All contracted 2015 LIURP Agencies	35	LIURP Administrator Workshop	COS Enhancements, LIURP Training Manual, LIURP Processes, 2015 Contract, Budget, Invoicing
5/7/2015	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Trainee Representatives	1	Outreach Overview	Review of USP and UGI Assistance Programs
6/3/2015	Harrisburg Salvation Army	1122 Green St, Harrisburg	2 Hours	New Caseworkers	2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
7/15/2015	All Agencies	Wilkes-Barre, Mohegan Sun Pocono	8 Hours	All CAP Caseworkers	72	CAP - Updates on Universal Service Plan Changes	Universal Service Plan changes. New CAP Rules. High Usage Energy Conservation presentation.
07/22/15	TREHAB	36 Public Ave Montrose, PA	4 Hours		4	Collection of LIURP Process	Quality Control and COS review for Caseworker; Budget and Quarterly goals with Administrators

8/6/2015	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Trainee Representatives New Caseworkers	5	Outreach Overview	Review of USP and UGI Assistance Programs
08/18/15	TREHAB	Webinar	2 Hours		2	LIURP Caseworker Trainnig	COS, LIURP Processes: Intake, Audit, Measure Entry, Job Completion, Customer Follow up
08/28/15	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives	5	Outreach Overview	Review of USP and UGI Assistance Programs
09/22/15	All LIURP Caseworkers	Penn College of Technology - NSSC	8 Hours	All contracted 2015 LIURP Agencies	29	Annual LIURP Contractors Workshop	Measure Installation, Safety Testing
09/29/15	All LIURP Caseworkers	Penn Collegev of Technology - NSSC	8 Hours	All contracted 2015 LIURP Agencies New Caseworker	27	Annual LIURP Workshop	Measure Installation, Safety Testing Review of Operation Share Caseworker Training Manual
10/6/2015	Reading Salvation Army	301 S 5th St, Reading	2 Hours		1	Operation Share Program Training	Manual
10/26/15	Berks County BeWise	Crown Plaza Reading	8 Hours 1.5 hours	Community event	200+	LIURP Program Overview & Round Table	Presented on Panel for Outreach Programs, Theresa presented in session covering LIURP
10/26/2015	Call Center Representatives	Wilkes Barre		Call Center Trainee Representatives	3	Outreach Overview	Review of USP and UGI Assistance Programs
11/12/15	Pure Energy	UGI Reading Office	2 Hours	Pure Energy New Caseworker	1	CAP High Usage Process	Customer Energy Education Review of Operation Share Caseworker Training Manual
11/13/2015	Allentown Salvation Army United Way of Lancaster County	144 N 8th St, Allentown	3 hours	Lancaster County Caseworkers Call Center Billing Representatives	50	Round Table	Review of USP and UGI Assistance Programs
11/16/15	Call Center Representatives	Reading	1.5 hours	Call Center Billing Representatives	7	Operation Share	Review of Operation Share Call Center Training Manual
12/3/2015	Call Center Representatives	UGI	2 hours	Call Center Billing Representatives New Caseworkers	5	CAP	Program Rules, Benefits, Requirements
12/8/2015	Allentown Sal Army All Contracted Community Partners, interested parties	144 N. 8th St, Allentown	4 Hours	Registered Attendees	2	CAP Caseworker Training Updates on Universal Service Programs	CAP Solicitation, Enrollment, Recertification, Task Completion.
12/16/2015	All Contracted Community Partners, interested parties	Webinar	1 Hour	Registered Attendees	10	Updates on Universal Service Programs	Updates on Universal Service Programs and changes
12/18/2015	All Contracted Community Partners, interested parties	Webinar	1 Hour	Registered Attendees	15	Updates on Universal Service Programs	Updates on Universal Service Programs and changes
12/21/2015	Call Center Representatives	Wilkes Barre	1 hour	Call Center Trainee Representatives New Caseworker	6	Outreach Overview	Review of USP and UGI Assistance Programs
1/11/2016	NHS	UGI Reading Office	4 hours		1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion.
1/12/2016	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives	4	Outreach Overview	Review of USP and UGI Assistance Programs
1/28/2016	Call Center Representatives	Wilkes Barre	4 hours	Call Center Billing Representatives	6	CAP	Review of COS & Billing
1/28/2016	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Billing Representatives	5	LIHEAP	Review of LIHEAP Program
2/10/2016	Call Center Representatives	Reading	2 hours	Call Center Billing Representatives	8	Full Billing Training	Review of Billing for all Assistance Programs

Response of UGI to CAUSE-PA II-8

Question 8 (Prepared by Robert Stoyko)

Please list every instance in which a Social Security Number is requested or required from a UGI applicant or customer - including any requirements for production of a Social Security Number in the course of enrollment in Universal Service programs. For each instance, please:

- a. Identify whether the SSN is requested or required.
- b. Explain the purpose of requesting or requiring the number.
- c. Indicate any exceptions and/or accepted alternative documentation.
- d. Provide the portions of UGI's call scripts which request or require the information.

Response:

a. On a request for service, an applicant is screened for prior UGI service and their payment history. If they did not have service, or if they had poor payment history, we run an Experian TEC report which requires a SSN.

b. We request the SSN to perform the credit check. When we do not have prior UGI service history, the SSN is used to verify identity as well as credit worthiness.

c. If an applicant does not wish to provide their SSN, they are permitted to provide their address from their license or State ID.

d. Please see Attachment CAUSE-PA II-8.

Attachment File Name	Attachment Note
<u>CAUSE-PA II-8.pdf</u>	

Residential Applications

(Phase 1 of training)

Definitions:

- **Customer** – A natural person at least 18 years of age in whose name a residential service account is listed and who is primarily responsible for payment of bills rendered for the service or an adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested. A natural person remains a customer after discontinuance or termination until the final bill for service is past due. Any customer who needs service at another address does not have to go through the whole application process to get new service. Normally, they would not have to pay a security deposit. Exceptions to this are when they are applying for concurrent service or they have a current termination notice for their current account.
- **Applicant** – Any natural person at least 18 years of age not currently receiving service who applies for residential service provided by a public utility or any adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested.
- **Concurrent Service** – When a customer has more than one account active at the same time.
- **Foreign Load** – Refers to the registration on a customer's meter that is not used directly and solely by the customer, of which the customer has no prior knowledge, and for which the customer receives no compensation or financial consideration. Foreign loads accounts **must** be in the name of the property owner. A tenant cannot be responsible for this service.
- **Landlord/Tenant** – When the utility service is in the landlord's name but a tenant or tenants are living at the property and benefiting from the service.
- **Ratepayer/Occupant** – An individual or organization that is not the property owner and does not have any connections with the property but would be putting the utility service in their name for someone else. An example of this would be a company or organization putting service in their name for an employee or a parent putting service in their name for a child that is a college student.

Scope:

In accordance with PUC regulations, all residential applicants who do not meet our credit standards must be notified in writing of the reason for the denial of service. Requesting a security deposit implies a denial of service even when we are billing it on the first bill. This procedure is designed to show the CCR proper handling for each scenario when a customer or an applicant is applying for service. The procedure will explain what information the CCR is required to ask a customer/applicant when applying for service, when to approve or deny service, and when the call may need to be transferred to the credit queue to complete the application for service.

If a customer or an applicant is calling because he/she was shut off for non-payment and wants service reconnected, the call will need to be transferred to the credit queue at extension 7809.

Procedure:

Before taking an application for service, always review MEMC and ACNX for recent activity. If the Gas/Electric is on, check KAHR to see if there is a current shut-off notice.

If the account has a status of **Inactive, Removed, or is a 26 account**:

- **UGI Gas** - Please follow your Inactive, Removed, 26 Accounts procedure.
- **PNG Gas** – You must rely on MEMC & work order history (ACNX & JADX) to determine if the service has been cut. Look for any orders that start with the letter “G” and documentation stating whether or not the service was cut. If the service was cut, do not take an application. Transfer the caller to the Internal Sales Group (ISG) at Extension 7829. If there are no work orders or documentation stating service was cut, it is o.k. to take an application for service.
- **Electric** – If the status is removed, the caller needs to be transferred to New Installs at Extension 7822. Otherwise, it is o.k. to take an application for service.

Important information related to residential applications:

- Always verify you are speaking directly to the person responsible for the service. If somebody other than the responsible person calls, take as much information as possible and issue a turn-on hold. The order cannot be released until the person responsible calls to authorize the service in his/her name.
- It is o.k. to release the work order for a legal power of attorney as long as UGI is provided proof.
- Calls from an interpreter will be accepted provided the customer/applicant is present.
- Always scan UGI CIS by social security number and name line 1 first. If the applicant did not have previous service with UGI, run an Experian connect check.
- An Experian connect check must be run again if the last connect check was done over 30 days ago for the same applicant.
- When a person is being transferred to the credit queue to complete an application, document the account before transferring to credit. The documentation must have all application information including Experian results and pin number (if there is a pin number).
- When issuing a turn-on hold and transferring the applicant to the credit queue, do not quote the deposit and do not put the deposit amount on the DATA screen of the work order. The credit CCR will do this.
- When releasing a turn on hold, make sure all other turn on holds at the same address are canceled.
- If a customer/applicant asks to have a security deposit split, we must do so. The deposit would be split as: 50% - 25% - 25%.
- Do not ask for a deposit if it is less than \$50.00. However, make sure the average bill is not low simply because the property has been vacant. If the usage does not appear normal, consult a Senior CCR or Supervisor.
- The default deposit amount when no other usage is available is \$180 for Residential heating accounts.

- If you see a foreign load indicator (F/L) on the bill screen, you cannot put service in a tenant's name. The service must remain in the property owner's name.
- We will allow a parent to put service in his/her name for a child that is a college student. We will also allow a company or organization to put service in their name for an employee. When doing this, the account must be coded "Ratepayer Occupant" (R/O).
- Service can only be put in the name of a person living at the property, on the mortgage, deed, or lease. We will not allow anybody else to take over service unless it's a ratepayer occupant (R/O) situation as described above.

The outline below will be used as a guide for the steps to be followed when taking an application for service:

- Information requested to open a new account.
- Customer transferring service.
- Applicant applying for service.

Information requested to open a new account

1. Address where service is being requested. Verify spelling, apartment number if applicable. If you cannot determine what apartment number the applicant/customer is responsible for, ask for the name of the last person living there or a meter number.
2. Full name of applicant/customer (including middle initial) Verify spelling.
3. Social Security number. If customer declines, run connect check with address on state identification.
4. If applicant, ask "have you ever had service with UGI"? If the answer is yes, ask where?
5. If service needs to be turned on, get the requested turn on date. If service is on, get the responsible date.
6. Owner or Renter?
 - **Owner** - Is there anybody else on the mortgage or deed? If so, who? Is this an investment property, rental?
 - **Renter** – Do you have a lease? If so, how long is the lease? Is anybody else on the lease? Who is the landlord? What is the landlord's address and phone number?

If anybody else is on the mortgage, deed, or lease, explain to the caller that UGI will be adding the other person on the mortgage, deed, or lease to the second name line. If you are told not to add them, do not add them, but document the name(s). Make the caller aware that you will not add them to the account, but they are still just as responsible for the gas/electric service as the person on the name 1 line.

7. Number of people, including children, residing at the property. (Use the income guidelines chart to determine if the household income is below poverty level). **A low income guidelines chart is given to the CCR every year. Example, page 6. If the customer is low income, the mail screen will display Low Income along with an expiration date which is one year from the date the account automates. Example, page 7.**
8. Mailing address. If the mailing address is different from the service address, the CCR must add sales tax to the DATA screen and send a Residential Tax Exemption letter (TAXE) off the letter add screen, LETA.

9. Quote tariff charge. **Example, page 8 & 9.**

10. Access:

- **Gas** - If the gas is off, get access information. Water & electric must be on to turn on the gas. If the gas is on, check to see if there is an ERT device, if there is an ERT or the meter is outside, the customer will not have to be there. If there is not an ERT and the meter is inside, we will need access information.
- **Electric** – Most of the time, we do not need access to turn on Electric. Most electric meters are outside. If the meter is inside, UGI will need access. Check the meter size code on the METI screen to determine crew headquarters. Most residential crew headquarter is 6725KO which is the default crew headquarters. **This information can be found in the DOJM manual and on Launchpad.**

Customer transferring service

1. Check the customer's current account to check credit status.
2. Take information requested to open a new account.
3. If the customer does not have a shut off notice and does not have a delinquent balance at the current address, release the order.
 - If the customer has an active shut off notice, issue a turn on hold and transfer the customer to the credit queue, extension 7809.
 - If the customer was shut off for non-payment and now wants service at a new address, issue a turn on hold at the new address and transfer the customer to the credit queue, extension 7809.
 - If the customer is delinquent, but does not have a shut off notice and is requesting service be transferred to a new address, release the work order. You must also inform the customer the delinquent balance will be transferred to the new account. Send a MEMO to ZMCA1 to transfer the balance to the new address/account number.
 - Any customer requesting concurrent service who is not already an established CR-1 customer must pay a security deposit.

Applicant applying for service:

If the applicant is applying for service at an address that was shut off for non-payment (SONP) within the last 6 months, take application, do a turn on hold and transfer the call to the credit queue, extension 7809.

1. Take information requested to open a new account.
2. Scan social security number and name line 1 in the CIS.
 - a. If the applicant had a previous account with UGI and was CR-1 with no outstanding balance, release work order, no deposit.
 - b. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance and no late penalty charges, release work order, no deposit.

- c. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance, but had late fees, run an Experian connect check.
 - d. If the applicant had a previous account with UGI and was CR-3 with no outstanding balance, run an Experian connect check.
 - e. If the applicant had a previous account with UGI and was CR-3 with an outstanding balance, do a turn on hold and transfer the applicant to the credit queue, extension 7809. Credit will quote conditions for service and send a denial/user letter.
3. If the applicant did not have a previous account with UGI, run an Experian connect check.
- a. If the applicant passes the Experian connect check, release the order.
 - b. If the applicant fails the Experian connect check for deposit only:
 - i. Gas/Electric on – release the order and bill the deposit. Send USER letter.
 - ii. Gas/Electric off – do a turn on hold and deny service for deposit only. Make sure to give the applicant the deposit identification number and payment options for the security deposit payment. Send DENL letter.
4. If identification is an issue, deny for 2 forms of valid Identification and a security deposit. Identification is covered in the Experian section of the manual.

Response of UGI to CAUSE-PA II-11

Question 11 (Prepared by Robert Stoyko)

What is UGI's policy and procedure for handling medical certification requests pursuant to 66 Pa. C.S. § 1406(f) and 52 Pa Code § 56.113? Please explain and provide supporting documentation, including all call scripts, written policies and procedures, internal memoranda, or other directives regarding the processing and/or handling of medical certificates.

Response:

Please see Attachment CAUSE-PA II-11.

<u>Attachment File Name</u>	<u>Attachment Note</u>
CAUSE-PA II-11.pdf	

Medical Certification

Definitions:

Medical Certification – A form that can be completed by a physician, physician's assistant, or nurse practitioner certifying that a serious medical condition exists in a home and would be aggravated in the absence of utility service.

STAY Code 51 – Medical certification STAY used to hold an account from collection activity

KISU Hold – Method used to extend a termination date

Scope:

The medical certification procedure is utilized for the following reasons:

- To prevent a shut off for non-payment
- To defer collection activity
- Reconnection after shut off for non-payment
- To expedite a turn-on for an applicant. In this situation, an applicant is a customer who wishes to restore service at a property that was shut off for non-payment and the final bill is past due. This procedure does **not** pertain to brand new applicants.

Procedure:

Determine Eligibility:

- Review MEMC's and STAY history for prior medical certifications
- An account is eligible for 1 medical certificate and 2 renewals
 - Renewals are per household, not per person
- If there has already been 1 medical certification and 2 renewals, review the account to see if the delinquent balance had been satisfied.
 - If the balance was satisfied, the customer is eligible
 - If the balance was not satisfied, the customer is not eligible

Accounts with an active shut off notice

- When a customer has an active shut off notice and cannot pay but states that a serious medical condition exists in the household, a 3 day hold must be entered via KISU. Customer should be advised to have the doctor's office call UGI immediately. If there is not an active shut off notice, just document the account via MEMC.
 - Any employee from the doctor's office may call UGI to request the form
 - UGI will not fax a medical certification form directly to the customer
 - If the doctor's office is too busy to call, they may request the form in writing via fax or email
 - If the doctor's office sends a note on a prescription pad or doctor's office letterhead, including all of the required information, we must accept this as a valid med cert.

- Once the doctor's office calls to request the medical certification form:
 - Advise the doctor's office that the form must be completed and returned to UGI as soon as possible to avoid interruption of service; or to restore service
 - The following information must be verified on the form:
 - The name of the person in the home that is ill
 - The length of time, not to exceed 30 days, that the service cannot be terminated
 - The condition will worsen without service
 - Name, office address, and office phone number of the certifying physician
 - If the completed form is not returned, the shut off procedure will automatically continue
- Once the completed form is returned, or a note on prescription pad/letterhead is received:
 - Enter a STAY code 51 for the amount of time specified on the form
 - This will automatically add the 'HBI' indicator on BILL
 - Cancel shut off activity (either by KISU or cancel DOJM order)

*** Note: UGI can dispute the validity of any medical certificate by petitioning the PUC. However, the certificate is considered valid until a decision is made by the PUC.*

Medical Certification for Reconnection

- A medical certification can be used to restore service after it has been shut off for non-payment, provided the service has not been terminated for more than 30 days
 - If the service has been inactive for more than 30 days, this becomes an applicant situation, not a reconnection. In this situation, a medical certificate may be used to expedite reconnection once all credit requirements have been met
- Once the completed medical certification is returned, the CCR will issue a reconnection using the job code 21-102 (gas) or 21.102 (electric)
 - Note in the COMMENTS section of the order the time by which the reconnection must be completed
 - Change the priority of the order to a '2'. This will change the color of the order on the dispatcher's system and draw attention to the order to ensure it is completed within the required timeframe
- UGI will make a diligent effort to restore service on the day of receipt of the medical certification. Check with dispatch for same day approval. If approved, FORCAD the order for today's date. In any case, the service shall be restored within 24 hours
 - Gas Accounts – if the medical certificate is received on a Friday, check with dispatch to see when the order should be scheduled

- Electric Accounts – Friday medical certificate reconnections will be done the same day
 - Prior to 4:30, an email is to be sent to EDMSR to have the order done the same day
 - After 4:30, the after-hours call out procedure is to be used
- Security deposits for gas and electric customers will be billed. On gas accounts, the reconnect fee will also be billed.
 - Reconnect fees can be billed by using the code MIS on the DATA screen
 - Security deposits should be billed in 3 installments (50%, 25%, 25%)
 - Remind the customer that any monies paid will be applied to the security deposit first
- Customer should be advised of requirements necessary upon expiration of the medical certificate
 - If a customer is not eligible for a new payment arrangement, do not offer one. The customer will have until the end of the medical certificate term to bring the prior agreement up to date

Expiration of Medical Certification

- Once a medical certification expires, the original grounds for termination shall be revived
 - UGI may terminate service without additional written notice if notice was previously mailed or delivered and has not yet expired
 - If the original notice has not expired, UGI will re-start the termination process at the 3-day step
 - Notices are valid for 60 days from the date they are originally issued. If there is a protection from abuse, the notice is only valid for 30 days from the date it was originally issued

Special Situation Medical Certification

- Landlord/Tenant Accounts
 - Any tenant in the affected building is entitled to a medical certification
 - The landlord is entitled to a medical certification only if he/she lives in the affected building
- Remaining Occupant & User Without Contract
 - If the ill person in question is listed on income/occupant, they are entitled to a medical certification
 - If the ill person in question is not listed on income/occupant, they are not entitled to a medical certification
- CAP (Customer Assistance Program)
 - CAP customers are eligible for 3 medical certifications per CAP balance
 - Eligibility is not based on the customer's A/R balance.

Response of UGI to CAUSE-PA II-12

Question 12 (Prepared by Robert Stoyko)

With respect to medical certificates, please answer the following:

- a. How many medical certificates has UGI received in the last five years, disaggregated by month?
- b. Of the customers identified in subpart (a), please identify the number of months that a medical certificate was applied to the same customer account.
- c. Under what circumstances does UGI grant a fourth request for a medical certificate?
- d. Does UGI request or require use of its own medical certificate form? If so, provide a copy of any such form and indicate whether it is requested or required.

Response:

- a. Please see Attachment CAUSE-PA II-12-1.
- b. The company is not able to distinguish between first time medical certificates and renewals for the same customer.
- c. UGI does not grant a fourth request for a medical certificate, unless done inadvertently.
- d. Yes, UGI's form was reviewed to be consistent with PA utilities by the Energy Association of PA. Please see Attachment CAUSE-PA II-12-2.

<u>Attachment File Name</u>	<u>Attachment Note</u>
CAUSE-PA II-12-1.pdf	
CAUSE-PA II-12-2.pdf	

Medical Certificates					
	2011	2012	2013	2014	2015
January	19	19	16	17	10
February	24	17	16	9	4
March	71	102	47	28	41
April	174	184	191	100	102
May	160	199	192	111	120
June	178	232	194	108	94
July	265	227	190	80	109
August	197	221	198	119	89
September	226	160	221	103	85
October	190	154	185	91	60
November	205	176	151	38	11
December	100	78	34	2	4
TOTAL*	1809	1769	1635	806	729

*2011, 2012, and 2013 data included temporary holds prior to receiving physician verification.



Emergency Medical Certification

All Fields are required information.

Please fax to 610-736-5863 when completed.

Completed by UGI or Customer

Date: _____

Name of Customer of Record: _____

Customer Number: _____

Service Address: _____

City, State, ZIP: _____

Mail address (if different) _____

Phone Numbers: Home: _____ - _____ - _____

Completed by Physician, Physician's Assistant or Nurse Practitioner

Name of Patient _____

Relationship of Patient to Customer of Record _____

I am a duly licensed physician, physician's assistant, or nurse practitioner under the laws of Pennsylvania and my office for the practice of medicine is located at:

I certify that in my professional opinion the above-named patient is seriously ill and has been diagnosed with a medical condition for the anticipated length of time which requires the continuation of service to treat the medical condition.

Utility service should, therefore, not be terminated for at least _____ days after the date on this form.

This certificate is in effect for a maximum of 30 days. I understand that I may be contacted to verify the statements contained herein.

Signature of Physician, Physician's Assistant, or Nurse Practitioner _____ Date _____

License Number _____ Phone Number _____

Utility service may be shut off at the above address unless this notice is completed or required information is received and signed by a physician, physician's assistant, or nurse practitioner. If utility service is currently off, service will be restored upon receipt of the completed form. Please note, the customer of record continues to have the responsibility to make a reasonable payment agreement on amounts owed to UGI Utilities, Inc.

Response of UGI to CAUSE-PA II-25

Question 25 (Prepared by Robert Stoyko)

What is UGI's procedure for handling security deposit waiver pursuant to 66 Pa. C.S. § 1404 (a.1)? Provide a copy of UGI's policy and/or procedure and any written memoranda or other documents related to application of security deposit waivers.

Response:

UGI Gas does not require a customer or applicant that is confirmed to be eligible for a customer assistance program to provide a cash deposit. Please see Attachment CAUSE-PA II-25.

Attachment File Name	Attachment Note
CAUSE-PA II-25.pdf	

Chapter 14 Changes

(Effective 12/22/14)

Applicant – A person who's prior service has been removed from their name for more than 30 days. (Final Bill due date no longer applies)

Customer – A person remains a customer until 30 days after the services have been discontinued.

What this means for you:

- You cannot deny a party service at a new property if their service has not been discontinued under their name for 30 days.
- After 30 days of the service being discontinued under a party's name, they are considered an applicant and a denial/user letter is **required**.
 - If applicable, a deposit should be quoted and balance, if any.

Security Deposits - No public utility may require a customer or applicant that is **confirmed** to be eligible for a customer assistance program to provide a security deposit.

Confirmed Eligible Customer - Will have received a LIHEAP/CRISIS or Operation Share or other assistance (605) grant within the past 12 months, be a CAP customer, or have been a participant of LIURP within the past 12 months.

- Deposits will not be imposed to *confirmed* assistance eligible customers due to poor creditworthiness.
- A *confirmed* assistance eligible customer will not be quoted a deposit upon reconnection.
- Applicants and customers required to pay a deposit for reconnection shall pay the deposit in accordance with commission regulations (50%, 25%, and 25%).

What this means for you:

- You will not ask for income verification on an initial application.
 - If not already *confirmed* eligible for a customer assistance program and a deposit is required due to a customer's poor payment history, you will quote the deposit.
 - If an applicant states they are not able to afford the deposit and provide you detailed information about their income that implies they are low-income, the **deposit should be waived**.
1. At that point, advise the customer you will waive the deposit and turn-on/transfer service.
 2. **Explain to the customer that failure to enroll into a customer assistance program or pay on-time, they may be assessed a deposit at a later date.** (Exception: Choice customers cannot be enrolled in CAP at this time.)

3. Send a MEMO to Outreach (ZMOUT) requesting a CAP application be sent once the service is active.
4. **DO NOT** code the “Name Type” field on the DATA screen as an “L” unless the customer is already *confirmed* eligible for a customer assistance program.

Deposit Hold Period for Residential Customers– A public utility may hold a deposit until a timely payment history is established for 12 consecutive months. Failure to make on-time payments for the time frame listed will result in the deposit being held indefinitely or until service is terminated or a service request is received to discontinue service.

Deposit Interest – Effective 1/02/2015, the interest rate for the 2015 calendar year will be 3%.

- On January 1 of each year, a new annual interest rate, if any, will be calculated.
- Interest will be applied annually to the deposit.

Payment Agreement Guidelines – When a customer or applicant contacts a public utility to make a payment agreement, the public utility shall:

- 1) Provide information about the public utility’s customer assistance programs
- 2) Refer the customer or applicant to the administrator of the customer assistance programs to determine eligibility for a program, and to apply for enrollment in a program

What this means for you:

- A customer, upon denial OR acceptance of a payment agreement shall still be provided with the additional options available to them including:
 - Assistance agency options
 - Providing proof of a Protection from Abuse Order (PFA)
 - PUC contact information
 - Providing a medical certificate

Automatic Meter Readings – Upon a customer request, the public utility shall secure an in-person meter reading to confirm the accuracy of the automatic meter reading device when a customer disconnects service or a new service request is received. A public utility may charge a fee, as provided in a commission-approved tariff.

What this means for you:

- Upon a request received from a customer to connect/disconnect service, you must provide the option to start/stop service with an estimated read, if eligible (Ex. FCALC), or to have an actual meter reading obtained while being charged a standard tariff fee.
 - Both options must be provided when eligible for an estimated read.
 - When a customer is not eligible to have their account opened/closed at no-charge, they should not be provided with the option to have a free, estimated read calculated.

Medical Certificate – A new medical certification form will be available on the CIC Launchpad and will need to be utilized effective 12/22/2014. The old form should no longer be sent to doctor's offices.

Indirect Changes per Regulations:

- We cannot make collection calls to provide a 72-hour notice prior to 8:00 a.m.
- You cannot immediately terminate service after being restored for a dishonored payment without posting a 72-hour notice first.
- We may terminate service from Monday through Thursday only.
- **High Balance Accounts:** We are required to report all residential accounts that have a balance over \$10,000.
- A new turn-on policy will be following in the months to come.

Response of UGI to CAUSE-PA III-5

CAUSE-PA-III-5 (Prepared by Robert Stoyko)
See Attachment CAUSE-PA II-18-2.

- a. Please provide a copy of the Excel spreadsheet that is used to track CARES referrals, redacting the name and account number.
- b. Provide a copy of the contents contained in a CARES packet.

Response:

- a. Please see Attachment CAUSE-PA-III-5-a.
- b. Please see Attachments CAUSE-PA-III-5-b-1 through b-4.

<u>Attachment File Name</u>	<u>Attachment Note</u>
<u>Attachment CAUSE-PA-III-5-a.pdf</u>	
<u>Attachment CAUSE-PA-III-5-b-1.pdf</u>	
<u>Attachment CAUSE-PA-III-5-b-2.pdf</u>	
<u>Attachment CAUSE-PA-III-5-b-3.pdf</u>	
<u>Attachment CAUSE-PA-III-5-b-4.pdf</u>	

90	12/6/2015	\$ 679.34	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	712	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
97	12/8/2015	\$ 189.16	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	279	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
98	12/10/2015	\$ 502.62	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	503	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
99	12/15/2015	\$ 705.30	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	705	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
100	12/15/2015	\$ 73.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	764	0	0	0	0	0			SAM	Established service		
101	12/15/2015	\$ 50.61	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0			SAM	Established service			
102	12/15/2015	\$ 713.98	4	0	6	\$ 41,388	1	0	0	0	0	0	5	-	0	5	-	0	0	0	1	5	714	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
103	12/15/2015	\$ 100.00	M	M	M	M	M	M	M	M	M	1	5	303	1	5	-	0	0	0	0	5	-	0	0	0	0	1	1	SAM	CARES Stay			
104	12/15/2015	\$ 73.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	Established Service 12/22/2015, CARES Stay		
105	12/16/2015	\$ 589.99	M	M	M	M	M	M	M	M	M	1	5	200	1	5	-	0	0	0	1	5	588	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
106	12/17/2015	\$ 400.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	400	0	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY		
107	12/18/2015	\$ 370.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	370	0	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY		
108	12/18/2015	\$ 400.00	4	2	9	\$ 28,392	0	0	1	0	0	0	5	-	0	5	-	0	0	0	1	0	0	1	5	400	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY
109	12/18/2015	\$ 400.00	5	0	6	\$ 20,640	1	0	0	0	0	0	5	-	0	5	-	0	0	0	1	0	0	5	400	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY	
110	12/21/2015	\$ 127.00	1	0	2	\$ 14,928	0	0	0	1	0	5	100	1	5	-	0	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	CARES Stay		
111	12/21/2015	\$ 110.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	Established service 12/24/2015, CARES Stay		
112	12/22/2015	\$ 271.48	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY		
113	12/22/2015	\$ 103.86	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
114	12/22/2015	\$ 37.00	1	0	1	\$ 7,980	0	0	0	0	0	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	Established Service		
115	12/23/2015	\$ 516.47	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	516	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY		
116	12/29/2015	\$ 400.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	0	0	1	5	400	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY
117	12/30/2015	\$ 311.51	2	0	4	\$ 30,720	1	0	0	0	0	0	5	-	0	5	-	0	0	0	1	5	312	0	0	0	0	0	0	1	1	LINEAP OS	TURN ON, OP SHARE, CARES STAY	
118	12/30/2015	\$ 73.51	m	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	1	5	500	0	0	0	0	0	0	1	1	LIBLITZ	TURN ON, OP SHARE, CARES STAY	
DEC		68.0	\$ 120	\$ 664,820	18	0	4	1	7	80	\$ 1,802	8	\$ 3,042	6	0	1	78	\$ 39,698	0	0	0	0	0	0	0	0	0	0	83	4	87	0		
2015	Total	87	11	177	\$ 852,847	20	1	7	1	15	71	\$ 2,703	13	\$ 9,128	10	0	7	95	\$ 45,331	0	0	0	0	0	0	0	0	2	0	108	5	115	0	
2015	Average	2.1	0.23	3.8	\$ 18,146																													

Not Accepted

1	1/8/2015	\$ 137.45	0	1	1	\$ 20,840							\$ -	0	\$ -	0	0	0	0	0	0	\$ -	0	0	0	0	0	0	1			Needs help. Over Inc for all Outreach	I called cont. Left message on voice mail. Also mailed conversation packet
2	4/7/2015	\$ 447.72	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1			Request Assat Inf	Mailed CARES Packet
3	8/3/2015	\$ -	m	m	m	m	m	m	m	m	m	1	m	m	m	m	0	0	0	0	0	0	0	0	0	0	0	0	1			Request Assat Inf.	Mailed CARES Packet
4	8/19/2015	\$ -										1																	1			Elderly	Called Aging office
5	12/15/2015	\$ 37.00	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	Established service	
6	12/15/2015	\$ 167.38	M	M	M	M	M	M	M	M	M	1	5	-	0	5	-	0	0	0	0	5	-	0	0	0	0	0	1	1	SAM	Established service	



Dear UGI Customer:

Enclosed is information from UGI CARES Department.

The information enclosed is tips on energy savings, safety and also information on the UGI Universal Services Programs.

Please take time to review the packet information. If you have any questions, please call UGI at 1-800-UGI-Warm.

Sincerely

UGI Utilities, Inc.

Enclosures

Conservation Tips



You will get significant savings by lowering the water temperature setting to 120° on your water heater.



If your clothes dryer has an automatic cycle, use it, because drying more than needed wastes energy and wears out clothes.



If you block or restrict air flow by placing furniture over heating and cooling registers, your heating system and air conditioner will have to work harder.



You should check and clean your dryer exhaust vent occasionally and remove lint after each load.



You should weather-strip all doors and windows or install storm windows and doors to prevent drafts.



If you keep your thermostat set on 68° in the winter, for every degree you raise or lower the setting, you can see a difference of up to 3% in energy costs.



You can keep hot water use to a minimum by washing only full loads in washers and dishwashers.



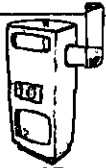
You can set up a payment plan for your winter bills that is spread out over the year, not just the winter months. Call your Electric or Gas company and ask to be set-up on Budget Billing.



Sealing air leaks is the first and most important step to home comfort.



Your hot water tank is usually the second greatest energy user in your home.



Your furnace requires routine maintenance, some from you, some from a furnace professional, in order to keep it safe and efficient.



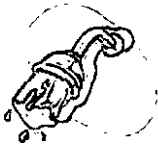
Air leaks in and out of your home around plumbing and wiring, around windows and doors, and where walls meet ceilings.



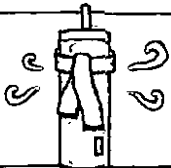
Lack of adequate weather-stripping can cost you \$50.00 or more a year in lost energy cost.



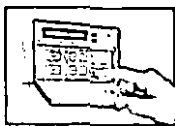
Washing clothes in cold water will not only prevents shrinking and fading, but will reduce your energy bill.



A seven minute or less shower under a two gallon per minute low-flow shower head is the more efficient than taking a bath in a bathtub full of water.



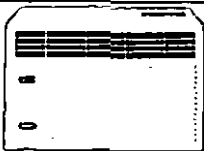
For safety reasons, wrap only the sides of a gas tank. Wrap the sides and top of an electric tank.



Install a setback thermostat which will lower the temperature while you sleep, and will raise it automatically just before you wake up.



It takes far less energy to lower the thermostat and then raise it later than to keep it set at the same setting at all times.



The more you can leave the air conditioner off, the more money you will save.



A 1/4 inch gap at the base of a three-foot wide exterior door leaks as much air as a three inch hole in the wall of your home.



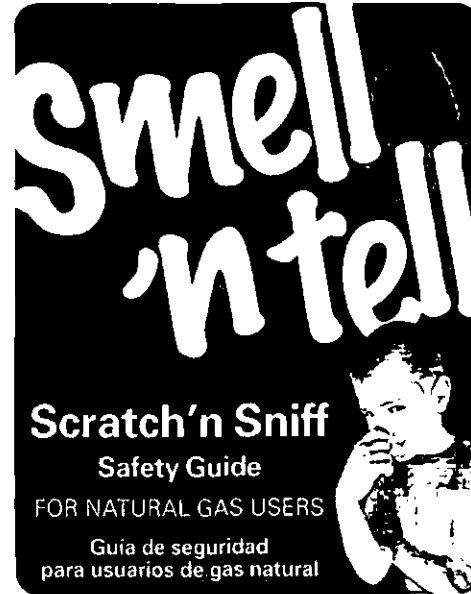
**Know what's below.
Call before you dig.**

It's the law: Call 8-1-1 three days in advance of any digging project.

Whether performing a major excavation or minor landscaping, safeguard yourself from hazards related to damaging underground pipelines.

One free call gets all of your utility lines marked to help protect you from injury and costly property damage.

Safe digging is no accident. Call 8-1-1 three days before you dig.

A graphic for a safety guide. The top half has the words 'Smell 'n Tell' in a large, white, bubbly font on a black background. Below this, the words 'Scratch 'n Sniff' are in a smaller, white, sans-serif font, followed by 'Safety Guide' in an even smaller font. Underneath, it says 'FOR NATURAL GAS USERS' and 'Guía de seguridad para usuarios de gas natural'. On the right side, there is a black and white photograph of a young boy sniffing his hand.



Smell 'n Tell.

Natural gas is naturally odorless.

That's why we add a scent. If your nose ever detects this very unique odor, you'll need to pay attention. If you smell a:

Faint odor: Don't panic. Just check if a pilot light is out, or if a burner is partially turned on. If you cannot find the source, don't investigate on your own. The source could be indoors or outdoors. Gas can enter your building through walls or drain lines even though your home may not be supplied with gas. Call UGI promptly.

Strong odor: Leave the building immediately. Do not switch anything on or off, and do not light a match or lighter. Then call our 24-hour emergency number **1-800-276-2722** from a neighbor's phone or from your mobile phone.

- **Scratch the blue flame** to smell the scent added to natural gas.
- **Rasque la llama azul** para saber cómo huele el aroma agregado al gas natural.

El gas natural no tiene olor.

Es por ello que le hemos añadido un aroma. Si alguna vez detecta este olor peculiar, debe prestar atención. Si percibe:

Un olor leve: No se asuste. Compruebe que no haya ninguna llama piloto apagada ni quemadores parcialmente encendidos. Si no puede encontrar el origen del olor, no lo busque por su cuenta. La fuente podría estar afuera o adentro. El gas puede entrar al edificio por las paredes y las descargas incluso si su casa no tiene servicio de gas. Llame rápidamente a UGI.

Un olor fuerte: Abandone el edificio inmediatamente. No encienda ni apague nada y no encienda cerillos o encendedores. Luego, llame a nuestro número de emergencias disponible las 24 horas al día **1-800-276-2722** desde el teléfono de un vecino o su teléfono celular.

UGI EMERGENCY PHONE NUMBER **1-800-276-2722**

Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP (Low Income Home Energy Assistance Program) is a federally funded program administered by each state that helps low income households pay their heating bills through energy assistance grants. There are two components to the LIHEAP program: CASH and CRISIS.

CASH COMPONENT: To be eligible for a cash grant, a customer must be responsible for home heating costs. CASH grants are payments that are applied directly to your UGI account. This is not a loan and the money does not have to be paid back.

CRISIS COMPONENT: Additional money may be available through a crisis grant. CRISIS grants help families who are in danger of being without heat.

Situations include:

- Having utility services shut-off
- Active termination notice
- Broken heating equipment
- Leaking fuel lines

Homeowners or renters whose gross annual income meets the income guidelines established for the program by the State are eligible.



To apply, a customer must have the names, Social Security numbers, proof of income for all household members and a recent heating bill.

For more information regarding this program, customers can contact UGI or their local County Assistance Office.

C.A.R.E.S. Program

CUSTOMER ASSISTANCE REFERRALS EVALUATION SERVICES (C.A.R.E.S.)

C.A.R.E.S. provides referrals to other helpful programs in your community. UGI will send any customer regardless of income a Customer Assistance Guide and energy related information specifically for their area. These programs can include the Low Income Home Energy Assistance Program (LIHEAP), budget counseling, state Weatherization or Office of Aging programs.

ELIGIBILITY CRITERIA

- Residential customer
- Customers experiencing a temporary personal or financial crisis

UGI Rehabilitation Program

FOR COMMUNITY BASED ORGANIZATIONS

The Rehabilitation Program was designed by UGI Utilities, Inc. with the intent of taking a pro-active approach to the existing Low Income Usage Reduction Program (LIURP). This program allows UGI Utilities, Inc. to contribute funding for the installation of approved energy efficient measures at the time of new construction or rehabilitation of an existing property. This program provides UGI Utilities, Inc. the opportunity to partner with Community Based Organizations throughout the service territory to distribute these funds to housing projects. Any Community Based Organization interested in obtaining further information or funds through this program may contact UGI Utilities' Customer Outreach Department at mail to: liurpteam@ugl.com.

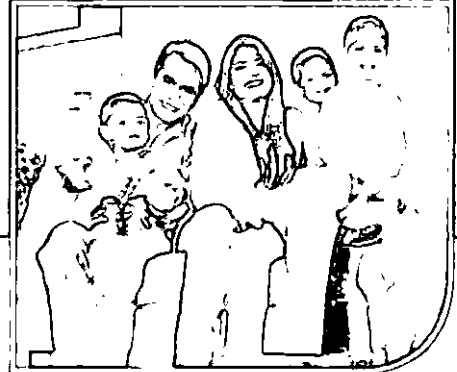
Additional Services offered by UGI:

- Conservation Literature
- Gift Credits
- Third Party Notification
- Extended Due Date
- Online Bill Pay
- Budget Billing
- Payment Arrangements



1-800-UGI-WARM (1-800-844-9276)

Universal Service Programs



For more information please call:

1-800-UGI-WARM
1-800-844-9276



Customer Assistance Program (CAP)

UGI's Customer Assistance Program (CAP) offers qualified low income customers assistance in managing their energy bill. The program benefits offered by CAP include:

- A personalized monthly payment based on income and average bill
- Past due debt forgiveness with on time monthly payments
- The difference between the CAP payment and the actual usage bill may also be forgiven

UGI partners with local community agencies to provide this useful program to its customers.

ELIGIBILITY CRITERIA

To be eligible, a customer must: (1) have household gross household income at or below 150% of federal poverty level; (2) be a residential customer with active energy service.

Household Size	150% FPL Household Income
1	\$17,820
2	\$24,030
3	\$30,240
4	\$36,450
5	\$42,660
6	\$48,870
7	\$55,095
For each addition person add:	\$6,240



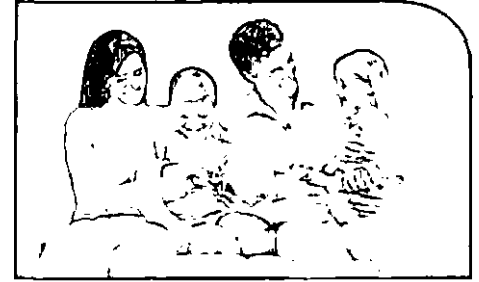
Low Income Usage Reduction Program

UGI's LIURP offers free weatherization measures to qualified low-income residential heating customers in order to limit heat loss and provide long-term energy savings. These energy savings measures may include window and baseboard caulking, door and window weather-stripping, attic and sidewall insulation, duct and pipe insulation, ventilation, water conservation devices, furnace inspection and energy education.

In addition, non-heating UGI Electric accounts may qualify for measures such as refrigerator replacement and high efficiency lighting.

ELIGIBILITY CRITERIA

- An active UGI gas or electric heating account with twelve (12) or more continuous billing periods for the same account number
- Higher than average gas or electric heating usage during the twelve month period to meet specified consumption levels for the program
- Renters can qualify with written permission from landlords
- Gross Annual Income at or below 150% of Federal Poverty Level (See CAP Income Guidelines)
- A percentage of customers who may have extenuating circumstances can be accepted at 200% of Federal Poverty Level (See Operation Share Income Guidelines)



Operation Share

The Operation Share program provides energy assistance grants to qualified customers who experience difficulty paying their heating bills. This community-based program is funded by voluntary donations from UGI employees, UGI customers and concerned citizens. In addition, UGI provides a corporate donation to help fund the program.

ELIGIBILITY CRITERIA

- The customer must have an active UGI account
- The customer's gross income must be at or below 200% of Federal Poverty Level
- This grant may be received one time per twelve (12) month period

Household Size	200% FPL Household Income
1	\$23,760
2	\$32,040
3	\$40,320
4	\$48,600
5	\$56,880
6	\$65,160
7	\$73,440
For each addition person add:	\$8,320

Response of UGI to CAUSE-PA III-11

CAUSE-PA-III-11 (Prepared by Robert Stoyko)

See CAUSE-PA I-11, "UGI completes an annual cross referral process. LIHEAP recipients are reviews and if eligible, a CAP application is mailed. Additionally, when calling UGI, LIHEAP recipients are referred to CAP by UGI's Customer Care Team. Calls related to past due balances or termination notices are also screened for CAP eligibility.":

- a. How many CAP applications were mailed as part of UGI's annual cross referral process?
- b. How many additional CAP enrollments were processed as a result of UGI's annual cross referral process?
- c. Did UGI perform any follow-up or make direct contact with customers who received a CAP application as part of its annual cross referral process? If yes, please explain and provide a copy of the communications.
- d. Please provide a copy of the communications and/or letter sent with the CAP applications as part of the annual cross referral process
- e. What is the difference between a CAP referral and screening for CAP eligibility? Please explain the process for each and provide supporting call scripts and/or customer communications that explain each process.
- f. Are customers who call UGI for the following reasons referred to CAP:
 - a. Past due balances
 - b. Terminations
 - c. Payment arrangements?
- g. Are customers who call UGI for the following reasons screened for CAP:
 - a. Past due balances
 - b. Terminations
 - c. Payment arrangements?

Response:

a. 3,595

b. As of the 2015 USRR report, the company reported 5,408 CAP participants received LIHEAP. The Company does not currently have the ability to track "solicits" for CAP in our Customer Outreach System. The solicit letters that are generated are completed in the company's CIS, (a separate warehouse).

c. Any customer inquiries or follow up actions were completed by the Company's agencies.

d. Please see Attachment CAUSE-PA I-11 Page 1 for the CAP application that is mailed to LIHEAP recipients.

e. A CAP referral is made when we believe the customer may qualify for CAP, but do not have confirmed income or all of the customer's required information.

Screening occurs when the utility's or Community Based Organization's representative has the customer's income information. In this process, the representative is able to provide the customer all the needed information for the customer to decide to enroll, inclusive of the CAP amount. Enrollment will occur upon customer consent. This occurs when the representative identifies a caller who received LIHEAP but has not participated in CAP.

f. Yes, for a, b, and c, provided the customer appears to meet CAP eligibility requirements. Referrals are made for non LIHEAP customers who have to apply at a local community agency to confirm their low-income status.

g. Yes, for a, b, and c, provided the customer meets CAP eligibility requirements and received LIHEAP. The customer will be screened and enrolled in the program upon customer consent.

No Digital Attachments Found.

Response of UGI to CAUSE-PA IV-2

CAUSE-PA-IV-2 (Prepared by Robert Stoyko)

Please indicate the number of homes served through LIURP by housing type (delineated below), disaggregated by program years 2013, 2014, 2015, and to date in 2016:

- a. single family homes
- b. individually-metered multifamily homes (units)
- c. manufactured homes

Response:

Please see Attachment CAUSE-PA-IV-2.

Attachment File Name	Attachment Note
Attachment CAUSE PA-IV-2.pdf	

	2013	2014	2015	2016
Single Family Home	78	88	106	3
Individually Metered Multifamily homes	0	0	0	3
Manufactured Homes	0	0	0	0

Response of UGI to CAUSE-PA V-12

CAUSE-PA-V-12 (Prepared by Robert Stoyko)

Please provide a breakdown of costs and expenses, along with a description of each line item, for the CARES program for 2013, 2014, and 2015.

Response:

Please see Attachment CAUSE-PA-V-12.

Attachment File Name	Attachment Note
Attachment CAUSE-PA V-12.pdf	

ATTACHMENT CAUSE-PA V-12

R.R. Stoyko

Page 1 of 1

	2013	2014	2015
Payroll	\$ 21,881	\$ 27,371	\$ 28,380
Advertising	\$ 50,492	\$ 36,977	\$ 33,499
Education Related	\$ 1,668	\$ 5,654	\$ 2,402
Total Cost	\$ 74,041	\$ 70,002	\$ 64,281

Response of UGI to Office of Consumer Advocate (OCA) III-4

Question 4 (Prepared by Robert Stoyko)

Reference: Lahoff, page 20. For each month since January 2012 to present inclusive, please provide:

- a. The number of CAP participants on the last day of the month;
- b. The average number of CAP participants.

Response:

a. Please see Attachment OCA-III-4.a

b. The average number of participants from January 2012 to January 2016 is 6,620.

<u>Attachment File Name</u>	<u>Attachment Note</u>
OCA III 4 a.pdf	

4A. The number of CAP participants on the last day of the month.

2012	Participants	2013	Participants	2014	Participants	2015	Participants	2016	Participants
1/30/2012	6,610	1/28/2013	4,858	1/27/2014	4,706	1/26/2015	7,615	1/25/2016	7,843
2/27/2012	6,652	2/25/2013	4,832	2/24/2014	5,137	2/23/2015	7,893		
4/2/2012	6,757	4/1/2013	4,913	3/31/2014	5,697	3/30/2015	8,485		
4/30/2012	6,733	4/29/2013	5,114	4/28/2014	6,073	4/27/2015	8,845		
5/29/2012	6,616	5/28/2013	5,195	5/27/2014	6,699	5/26/2015	9,069		
6/30/2012	6,428	7/1/2013	5,086	6/30/2014	7,193	6/30/2015	9,328		
7/30/2012	6,293	7/29/2013	5,018	7/28/2014	7,323	7/27/2015	9,193		
8/27/2014	6,024	8/26/2013	4,942	8/25/2014	7,363	8/31/2015	9,257		
9/24/2012	5,812	9/30/2013	4,795	9/30/2014	7,497	9/28/2015	9,109		
10/29/2012	5,544	10/28/2013	4,649	10/27/2014	7,487	10/26/2015	8,936		
11/26/2012	5,377	11/25/2013	4,522	11/24/2014	7,494	11/30/2015	8,428		
12/31/2012	5,046	12/30/2013	4,488	12/29/2014	7,457	12/28/2015	7,973		

Note: UGI captures enrollment numbers every Monday. The data provided is for the last Monday of every month.

Energy Assistance Summary (EASUM)

9/27/2015 - 3/31/2016

STATE WIDE

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG		ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	125,943	\$24,495,067	38	\$194	PAYMENT SENT	Electric	98,591	\$20,339,554	30	\$206
	Renter	156,695	\$33,044,085	47	\$211		FuelOil	58,364	\$13,711,347	17	\$235
	RenterWithHeat	6,100	\$650,380	2	\$107		Coal	2,540	\$443,863	1	\$175
	SubsidizedWithHeat	1,189	\$296,908	0	\$250		NaturalGas	154,917	\$29,669,311	46	\$192
	SubsidizedNoHeat	39,099	\$8,932,275	12	\$228		Kerosene	6,182	\$1,742,125	2	\$282
	Roomer	298	\$47,760	0	\$160		Propane	10,252	\$2,002,695	3	\$195
	Other	4,300	\$1,133,643	1	\$264		WoodOrOther	1,250	\$285,062	0	\$228
							BlendedFuel	1,528	\$406,161	0	\$266
RACE	AmericanIndian	515	\$111,804	0	\$217	INCOME RANGE	0 - 999	17,152	\$13,647,982	5	\$796
	Other	25,740	\$5,135,277	8	\$200		1000 - 1999	3,441	\$2,524,811	1	\$734
	NativeHawaiian	131	\$25,882	0	\$198		2000 - 2999	3,463	\$2,394,482	1	\$691
	Black	79,568	\$16,748,199	24	\$210		3000 - 3999	5,230	\$2,890,054	2	\$553
	White	220,460	\$45,171,793	66	\$205		4000 - 4999	5,456	\$2,164,510	2	\$397
	Asian	5,316	\$967,935	2	\$182		5000 - 5999	5,581	\$1,920,425	2	\$344
	Unknown	1,894	\$439,228	1	\$232		6000 - 6999	6,718	\$2,033,232	2	\$303
							7000 - 7999	8,100	\$2,140,043	2	\$264
DISABLED	YES	175,722	\$27,280,374	53	\$155	8000 - 8999	13,072	\$3,013,336	4	\$231	
	NO	157,902	\$41,319,744	47	\$262	9000 - 9999	57,956	\$11,425,683	17	\$197	
AGE 60 & ABV	YES	118,113	\$18,601,156	35	\$157	10000 - 10999	17,240	\$3,029,480	5	\$176	
	NO	215,511	\$49,998,962	65	\$232	11000 - 11999	19,676	\$3,037,637	6	\$154	
AGE 5 & BLW	YES	63,477	\$13,635,355	19	\$215	12000 - 12999	19,248	\$2,602,398	6	\$135	
	NO	270,147	\$54,964,763	81	\$203	13000 - 13999	21,530	\$2,585,645	6	\$120	
PAY_TYPE	DIRECT	12,865	\$1,473,245	2	\$115	14000 - 14999	17,082	\$1,877,989	5	\$110	
	PROVIDER	579,714	\$85,439,624	98	\$147	15000 - 15999	17,999	\$1,868,364	5	\$104	
REFUNDS		3,995	\$706,930		\$177	16000 - 16999	13,870	\$1,398,752	4	\$101	
						17000 - 17999	10,854	\$1,080,820	3	\$100	
						18000 - 18999	12,462	\$1,236,787	4	\$99	
						19000 - 19999	7,776	\$774,023	2	\$100	
						> 19999	49,718	\$4,953,665	15	\$100	
						PAYMENT TYPE	Regular	333,624	\$68,600,118		\$206
						Reissue	147	\$38,235		\$260	
						Secondpay	573	\$145,297		\$254	
						Underpay	409	\$63,362		\$155	
						Extraordinary	257,826	\$18,065,857		\$70	
					TOTAL PMT	592,579	\$86,912,869		\$147		
					RECOUPMENTS	126	\$24,513		\$195		
					NET PAID		\$86,888,356				
					PMT SUB TYPE	APD	0	\$0		\$0	
					STD	592,579	\$86,912,869		\$147		

AVERAGE HOUSEHOLD SIZE: 2.32

* Counts, Amounts (\$), % and AVG from HOUSING, RACE, DISABLED, OVER-60 and INCOME RANGE category are from Regular payments only

** Counts, Amounts (\$), % and AVG from PAY_TYPE category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

*** Counts, Amounts (\$), % and AVG from PAYMENT_SENT category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

HOME ENERGY CONSUMPTION EXPENDITURES

BY INCOME (PENNSYLVANIA)

May 2009

Prepared For:

***Pennsylvania Utility Law Project (PULP)
Harrisburg, Pennsylvania***

May 2009

**HOME ENERGY CONSUMPTION
AND EXPENDITURES BY INCOME**
(Pennsylvania)

Prepared for:

**Pennsylvania Utility Law Project (PULP)
Harrisburg, PA
Harry Geller, Executive Director**

Prepared by:

**Roger D. Colton
Fisher, Sheehan & Colton
Public Finance and General Economics
Belmont, Massachusetts**

"Dedicated to the power of concentrated expertise widely shared."

May 2009

One question that frequently presents itself today is the extent to which low-income households have higher or lower energy consumption than do higher income households. The question has numerous implications:

- Do rate designs with higher fixed costs help or harm low-income customers?
- Do energy efficiency investments adequately reach low-income customers?
- Do low-income customers have disproportionately high energy consumption that can be controlled through technology such as “smart meters,” prepayment meters, or service limiter adapters?

The analysis presented below examines energy usage and expenditures for Pennsylvania by income. The analysis focuses on three types of home energy use:

1. Natural gas used for space heating;
2. Electricity used for space heating;¹ and
3. Electricity used for non-space heating.²

Based on national, regional and state-specific data, the analysis below concludes that a direct relationship exists between income and home energy consumption. As income increases, home energy usage and expenditures increase as well.³

I. PENNSYLVANIA-SPECIFIC DATA

While data produced by the U.S. Census Bureau setting forth home energy bills by income level for Pennsylvania does not contain usage data, per se, the data on expenditures nonetheless provides reasonable insights into the relative use of natural gas and electricity by income level.

Pennsylvania data is set forth in Table 1. This Table presents monthly expenditures for natural gas, electricity (space heating), and electricity (non-space heating) as reported in the 2007 American Community Survey, which provides the most recent Census data available.⁴ As can be seen, expenditures for all three fuels (treating electricity used for space heating and electricity

¹ “Electricity used for space heating” includes all electricity expenditures by households using electricity for space heating.

² “Electricity used for non-space heating” includes all electricity expenditures by households not using electricity for space heating. The data excludes households reporting the use of “no fuels.”

³ Throughout this discussion, “home energy” refers respectively to the use of natural gas, the use of electricity by households using electricity for space heating, and the use of electricity by households using space heating fuels other than electricity.

⁴ The American Community Survey collects annual data on selected household and housing characteristics in years between the Decennial Census.

used for non-space heating as a separate “fuel” for these purposes) increase as each income tier increases in Pennsylvania.

Monthly natural gas expenditures for households with incomes more than \$250,000 were nearly twice as high as the monthly expenditures for households with incomes less than \$10,000 (\$143.90 vs. \$78.00) in 2007 while the monthly electric space-heating expenditures were more than three times higher (\$241.50 vs. \$70.70). So, too, did the monthly expenditures for electric non-space heating for households at the highest income range exceed electric non-space heating expenditures at the lowest range by nearly 300% (\$195.20 vs. \$66.70).

Indeed, the median income in Pennsylvania in 2007 was \$48,576. For median income, we find:

- The monthly natural gas expenditure for the income range encompassing that median income (\$40,000 - \$50,000) was \$109.50, nearly 40% higher than expenditures for households with incomes less than \$10,000 (the lowest income level) (\$78.00), but only 74% of expenditures for households with income greater than \$250,000 (the highest income level) (\$143.90).
- The monthly electric space heating expenditure for the income range encompassing median income was \$126.30, nearly 80% higher than expenditures for households with income less than \$10,000 (\$70.70), but half of the expenditures by households with income greater than \$250,000 (\$241.50).
- The monthly electric non-space heating expenditures was \$92.30, nearly 40% higher than expenditures by households with income less than \$10,000 (\$66.70), but only half of the expenditures by households with income greater than \$250,000 (\$195.20).

Figure 1 presents the same data graphically. The graphic presentation of the data reveals in clear terms the continuous increase in home energy consumption as household income increases for all three fuels.

The conclusions reached above do not change if the income status of households is measured by reference to income in terms of a ratio to Federal Poverty Level (FPL) rather than in dollar terms. Poverty Level is a measure of income taking into account household size. Poverty Level recognizes, for example, that a three-person household with an income of \$10,000 is “poorer” than a two-person household with an income of \$10,000.

Overlaying household size onto income by considering the Federal Poverty Level of a household does not change the results of the inquiry in Pennsylvania. Table 2 presents monthly home energy bills for Pennsylvania by increasing levels of the Federal Poverty Level. In Pennsylvania, the monthly home energy expenditure at 300% of Poverty or more is:

- 144% of the natural gas expenditures for households with incomes below 50% of Federal Poverty Level;

- 177% of the electric space heating for households with incomes below 50% of Federal Poverty Level; and
- 139% of the electric non-space heating for households with incomes below 50% of Federal Poverty Level.

CONSISTENCY WITH NON-STATE-SPECIFIC DATA

Other empirical analysis supports this finding that a relationship exists between income and home energy expenditures. The U.S. Department of Energy, Energy Information Administration (“DOE/EIA”) publishes regular periodic reports based on data from its triennial Residential Energy Consumption Survey (“RECS”). In June 2001, DOE/EIA released its analysis of RECS data titled *Natural Gas Use in American Households*. In the section of its analysis that examines the relationship between income and natural gas usage, DOE/EIA states:

The use of natural gas for any end use and as the main heating fuel was approximately the same regardless of household income category. In contrast, natural gas consumption and expenditures per household did vary by household income—higher income households consumed more and spent more on average. Higher income households lived in larger housing units, which require more energy for heating.⁵

INCOME AND THE SIZE OF HOUSING UNITS

The Department of Energy’s observation that “higher income households live in larger housing units, which require more energy for heating” applies to Pennsylvania as well as to the country as a whole.

Table 3 presents Pennsylvania data on home energy expenditures by income and housing unit size. In Table 3, the size of the housing unit is measured in terms of the number of bedrooms. As can be seen from Table 3, the difference in the average expenditures by income is far greater than the difference in expenditures by income within any given housing unit size. This is because the distribution of households by housing unit size is not similar between income ranges⁶ While there may be somewhat of a distinction between a higher-income household in a four-bedroom housing unit and a lower-income household in a four-bedroom housing unit, because there are far fewer lower-income households in four-bedroom units, the overall difference in expenditures is much greater.

The same impacts can be seen in Table 4. This data also presents the distribution of home energy expenditures by housing unit size. In Table 4, housing unit size is measured in terms of the total number of rooms (not merely the number of bedrooms). The same relationship is

⁵ EIA/DOE, *Natural Gas Use in American Households*, Household Income, at text accompanying Figures 1 – 3 (June 2001).

⁶ See, Table 5 and Table 6, *infra.* and accompanying text.

evident as was shown above. The average home energy expenditure in Pennsylvania varies sharply by income. As is the case with the number of bedrooms, the reason for this is that the higher-income households live in larger housing units.

Average Income and Housing Unit Size

This conclusion that higher income Pennsylvania households live in larger housing units is based on two different data-based observations. First, Table 5 presents the average income in Pennsylvania by the number of rooms in a housing structure, as well as the average income in Pennsylvania by the number of bedrooms in a housing structure. Table 5 clearly shows that as average income increases, housing structures get larger in Pennsylvania.

There are two standard ways to measure the size of a housing unit. One way is to look at the number of total rooms. The other way is to look at the number of bedrooms. Both of these approaches document that smaller sized units have lower-income households. For example, while the average income of a Pennsylvania household living in a unit with one room is \$20,929, the average income of a household living in a unit with nine or more rooms is \$148,268.

The same relationship holds true for housing size measured by the number of bedrooms. While the average income for a Pennsylvania household living in a unit with one bedroom is \$31,285, the average income of a household living in a housing unit with five or more bedrooms is \$156,324.

Whether the size of the housing unit is measured in terms of the number of rooms, or in terms of the number of bedrooms, the average income progressively increases as the size of the housing unit increases.

Distribution of Housing Unit Size by Income

The same results can be derived by examining the relationship between housing unit size (whether in terms of number of bedrooms or in terms of total number of rooms) and the income of households living in such units. Consider Table 6, which presents a distribution (rather than an average) of Pennsylvania households by the size of the housing unit in which they live, separately examining the size of the housing unit measured by the number of rooms and the number of bedrooms.

The data shows that a higher proportion of lower-income households live in smaller housing units. For example, while 48% of households with incomes less than \$10,000 live in units with two bedrooms or less, only 5% of households with income greater than \$250,000 (and only 6% of households with incomes between \$150,000 and \$250,000) live in units that small. Conversely, while 77% of households with incomes of \$250,000 or more live in units with four or more bedrooms (and 64% of households with incomes between \$150,000 and \$250,000 do), only 12% of households with incomes below \$10,000 live in units that large (and only 13% of households with incomes between \$10,000 and \$20,000 do).

The same observations can be made about the relationship of income and housing unit size measured in terms of the number of rooms (not merely number of bedrooms). While 80% of Pennsylvania households with incomes greater than \$250,000 live in housing units with eight or more rooms (and 66% of households with incomes between \$150,000 and \$250,000 do), only 9% of households with incomes less than \$10,000 do (identical to the 9% of households with incomes between \$10,000 and \$20,000 that do).

Income and Building Type

Others ways exist through which to gain insights into the relationship between housing unit size and income. One of the implications of housing unit size documented above is a difference in housing unit *type* as well. One extension of the observation that low-income households live in smaller housing units is the further observation that low-income households tend to live in smaller, denser housing units as well.

Examining the relationship between income and the type of building in which customers have their housing units helps to determine whether this is accurate for Pennsylvania. Building type is disaggregated by the type of construction (single family, multi-family, mobile home) and the number of units in each building.

Table 7 shows that residents of multi-family housing units are significantly disproportionately over-represented by low-income households. While 31% of households with incomes less than \$10,000 live in building units with three or more units, and 22% of households with incomes between \$10,000 and \$20,000 do, fewer than 3% of households with incomes of \$150,000 or more live in buildings with three or more units. Conversely, while between 86% and 90% of households with incomes \$150,000 or higher live in single family detached homes, only 29% of households with incomes less than \$10,000 do (and only 39% of households with incomes between \$10,000 and \$20,000 do).

This data supports the conclusion that low-income households have lower home energy consumption in two ways. Table 8 presents home energy expenditures data broken down by building type and income for Pennsylvania.

- Holding building *type* constant, it is possible to see the increase in natural gas expenditures as income increases. For example, in single family detached homes, natural gas expenditures increase from \$115.50 for households with incomes less than \$10,000 living in single-family detached homes to \$131.70 for households with incomes between \$150,000 and \$250,000 (and \$152.20 for households with incomes greater than \$250,000). The same relationship holds for electricity space-heating expenditures (\$173 to \$271.70) as well as for electricity non-space-heating expenditures (\$87.20 to \$214.70).
- Conversely, holding income constant, it is possible to see the decrease in natural gas expenditures as the type of building unit changes (with lower expenditures in buildings with multi-units). For households with income between \$20,000 and \$30,000, for example, natural gas expenditures decreased from \$125.40 in single-family detached

homes to \$29.90 in multi-family buildings with 50 or more units. Again, the same relationship holds for electricity space-heating (\$158.70 to \$42.70) and electricity for non-space heating (\$93.10 to \$36.50).

The conclusion can be drawn that comprehensive Pennsylvania-specific information shows two relationships. First, low-income households tend to live in smaller housing units. Second, smaller housing units tend to have lower home energy (natural gas, electric space-heating, electric non-space-heating) consumption. As a result, the home consumption of low-income households is, on average, lower than the home energy consumption of higher income households.

Federal Regional Data

The relationships identified in the Pennsylvania-specific data are consistent with other regional data reported by the federal government. The U.S. Department of Labor (“DOL”) reports home energy expenditures by region by income. Pennsylvania is in the Northeast regional data reported by the Department of Labor’s Consumer Expenditures Survey (“CEX”).

Table 9 presents the CEX data for the past four years (2006-2007; 2005-2006; 2004-2005; 2003-2004). The CEX data corroborates the state-specific data on the relationship between natural gas and electricity consumption and income.

- In each of the 36 cells (but two: \$30,000 - \$39,999 for 2005/2006 and 2006/2007), the Northeast natural gas expenditures for the higher income tier was more than the natural gas expenditures for the immediately preceding lower-income tiers. Natural gas expenditures for the lowest income tiers (below \$10,000) were roughly one-third the residential average.
- Electricity shows an almost identical pattern. In each of the 36 cells but two (\$5,000 - \$9,999 for 2004/2005 and 2005/2006), the Northeast electricity expenditures for the higher income tier was more than the electricity expenditures for the immediately preceding lower-income tier. Electricity expenditures for the lowest income tier (below \$10,000) were roughly 40% of the residential average.

HOUSEHOLD BASIC NEEDS BUDGET

The fact that lower-income households tend to squeeze all available savings out of their discretionary energy consumption is not surprising. Research shows that low-income households tend to be “good budgeters.” When household income does not provide sufficient resources to cover household necessities, low-income households tend to reduce their expenditures on those necessities.

In this respect, while the unaffordability of home energy in Pennsylvania is driven by the interaction of home energy bills and household income, the overall inadequacy of household income to cover the household’s basic family budget should be taken into account as well. A

basic family budget takes into account the entire range of household expenses, including housing, food, childcare, transportation, health care, necessities and taxes. To the extent that household income is insufficient to cover these basic expenditures, trade-offs must occur in what gets paid and what does not.⁷

A basic family budget varies based on both the household size and the household composition. Not only will a three-person family have a different budget than a two-person family, but also a one-parent/two-child three-person family will have a different basic family budget than a two-parent/one-child three-person family.

Table 10 summarizes the inadequacy of household incomes in Pennsylvania.⁸ Basic family budgets⁹ for four different family configurations were calculated, using different family composition and family size. Within the reported metropolitan areas for Pennsylvania (and a “rural” region), the basic family budget for a one-parent/one-child family ranged from a low of 227% of the Federal Poverty Level (Armstrong County) to a high of 296% of the Poverty Level (Philadelphia). Pennsylvania’s rural areas have a somewhat lower basic family budget than most, but not all, of the metropolitan regions (243% of Poverty Level).

Three-person families, whether configured as one-parent/two-child or two-parent/one-child families, were grouped more closely within the state, but still well-above 200% of Federal Poverty Level. A two-parent/one-child family has a somewhat lower basic family budget in Pennsylvania than a one-parent/two-child family.

Finally, while the absolute dollar amounts of the basic family budget for a two-parent/two-child family are higher than the corresponding budgets for smaller families, the ratio of those incomes to the Federal Poverty Level are lower. Two-parent/2-child families with income at 222% of Poverty Level in Erie and Williamsport along with families at 219% of the Poverty Level in Johnstown and 222% in Sharon are living with an income that would cover the basic family budget. In contrast, it would take these 2-parent/2-child families 246% of Poverty Level to meet their basic family budget in Allentown and 253% of Poverty Level to meet their basic family budget in Pike County.

The detailed calculations underlying this discussion of basic family needs budgets in Pennsylvania are set forth in Appendix A.

⁷ See, e.g., National Energy Assistance Directors Association (2003). 2003 Survey of Energy Assistance Recipients. Apprise, Inc: Princeton (NJ); National Energy Assistance Directors Association (2005). 2005 Survey of Energy Assistance Recipients, Apprise, Inc.: Princeton (NJ) (energy assistance recipients reduce expenditures on food, health care and other essentials in response to unaffordable home energy bills).

⁸ These Basic Family Budgets are calculated by the Economic Policy Institute. They are available at EPI’s web site: www.epi.org.

⁹ Unless the context otherwise clearly shows, a “family” and a “household” are considered to be synonymous for purposes of this discussion.

SUMMARY AND CONCLUSIONS

The data showing a direct relationship between income and home energy consumption in Pennsylvania is compelling. The differences that are evident in the data are not small. Low-income customers have lower usage not only as compared to high-income customers, but also when compared to average customers as well. In addition, the national data is consistent. The national data developed by the U.S. DOE, the regional data developed by the U.S. DOL, and the state-specific data developed by the Census Bureau all find the same relationship. Finally, the data is internally consistent. While DOE reports that income is related to home energy usage because of differences in housing unit sizes, that relationship is confirmed when housing unit size is overlaid on income and home energy expenditures in the Pennsylvania using state-specific data.

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Table 1.
Monthly Home Expenditures by Income (Pennsylvania)
2007 American Community Survey

	Natural Gas	Electric (Space Heating)	Electric (non-space heating)
\$1-\$10,000	\$78.00	\$70.70	\$66.70
\$10,001 - \$20,000	\$89.10	\$80.20	\$68.10
\$20,001 - \$30,000	\$102.60	\$99.60	\$78.70
\$30,001 - \$40,000	\$107.00	\$113.80	\$86.00
\$40,001 - \$50,000	\$109.50	\$126.30	\$92.30
\$50,001 - \$75,000	\$114.40	\$143.00	\$102.60
\$75,001 - \$150,000	\$117.50	\$171.50	\$121.10
\$150,001 - \$250,000	\$124.90	\$201.10	\$153.40
\$250,000 or more	\$143.90	\$241.50	\$195.20

**Figure 1. Monthly Home Energy Expenditures by Income
(Pennsylvania 2007)**

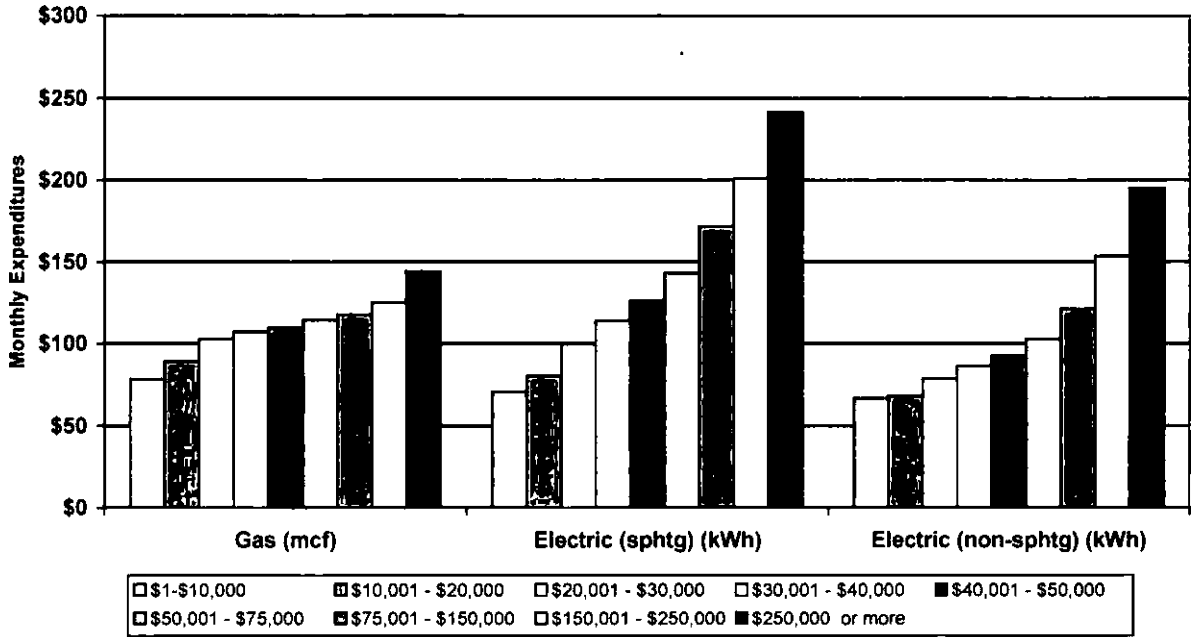


Table 2. Monthly Home Energy Expenditures by Ratio of Income to Federal Poverty Level (Pennsylvania)
(American Community Survey: 2007)

	Natural Gas		Electric (space heating)		Electric (non-space heating)	
	Monthly Expenditures	Average Poverty Level within Range	Monthly Expenditures	Average Poverty Level within Range	Monthly Expenditures	Average Poverty Level within Range
1 - 50%	\$84.50	27.6%	\$99.00	27.1%	\$89.70	27.7%
51 - 100%	\$86.00	75.9%	\$102.40	76.1%	\$87.80	76.3%
101 - 150%	\$92.50	125.7%	\$116.50	125.8%	\$95.20	126.2%
151 - 200%	\$99.40	176.9%	\$122.20	174.6%	\$102.40	176.8%
201 - 300%	\$105.90	250.9%	\$141.70	251.1%	\$107.20	251.2%
301% or more	\$122.10	446.7%	\$175.60	450.3%	\$124.90	445.0%

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**Table 3a. Monthly Natural Gas Expenditures by Number of Bedrooms in Home and Income (Pennsylvania)
(American Community Survey: 2007)**

No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$18.30	\$11.70	\$103.90	\$51.10	\$105.60	---	\$173.40	---	---
1 bedroom	\$37.90	\$45.40	\$45.70	\$49.80	\$50.50	\$45.10	\$57.00	\$17.20	\$37.80
2 bedrooms	\$80.30	\$89.50	\$87.90	\$90.70	\$87.90	\$98.40	\$87.40	\$101.30	\$108.90
3 bedrooms	\$101.20	\$109.00	\$129.00	\$123.10	\$126.80	\$121.00	\$119.90	\$125.50	\$134.10
4 bedrooms	\$125.50	\$126.80	\$122.40	\$161.30	\$133.00	\$146.80	\$124.80	\$130.00	\$142.20
5+ bedrooms	\$85.00	\$129.10	\$118.70	\$166.40	\$167.00	\$162.20	\$172.40	\$151.30	\$166.10
Total	\$86.10	\$95.90	\$109.90	\$116.60	\$117.10	\$122.30	\$121.80	\$129.80	\$145.80

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Table 3b. Monthly Electric (space heating) Expenditures by Number of Bedrooms in Home and Income (Pennsylvania) (American Community Survey: 2007)									
No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$25.50	\$25.60	\$37.70	\$42.40	\$16.70	\$18.20	\$56.40	\$71.00	---
1 bedroom	\$50.00	\$47.00	\$57.40	\$60.00	\$83.50	\$87.00	\$94.30	\$85.20	\$157.30
2 bedrooms	\$88.70	\$93.90	\$105.70	\$112.10	\$115.40	\$115.90	\$124.90	\$138.40	\$153.80
3 bedrooms	\$126.80	\$139.70	\$148.80	\$156.70	\$150.40	\$171.00	\$185.20	\$194.30	\$191.20
4 bedrooms	\$171.30	\$171.40	\$157.90	\$181.00	\$191.70	\$187.70	\$206.40	\$231.70	\$274.80
5+ bedrooms	\$181.60	\$41.10	\$135.50	\$183.60	\$222.50	\$214.20	\$239.70	\$283.20	\$299.40
Total	\$86.60	\$91.60	\$111.50	\$130.10	\$139.50	\$157.20	\$183.80	\$214.80	\$256.50

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**Table 3c. Monthly Electric (non-space heating) Expenditures by Number of Bedrooms in Home and Income (Pennsylvania)
(American Community Survey: 2007)**

No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$24.80	\$27.90	\$32.30	\$59.60	\$93.70	\$27.90	\$57.90	\$20.00	---
1 bedroom	\$41.30	\$51.40	\$53.60	\$58.50	\$61.50	\$67.60	\$76.90	\$111.20	\$75.90
2 bedrooms	\$63.70	\$68.90	\$72.50	\$75.90	\$82.20	\$88.00	\$97.60	\$111.00	\$113.20
3 bedrooms	\$88.70	\$84.60	\$95.70	\$102.50	\$103.00	\$109.10	\$119.90	\$139.60	\$151.20
4 bedrooms	\$104.90	\$90.50	\$113.80	\$113.30	\$120.00	\$137.40	\$147.00	\$177.50	\$214.20
5+ bedrooms	\$115.10	\$95.20	\$106.00	\$111.40	\$155.70	\$138.70	\$151.10	\$196.00	\$244.00
Total	\$77.20	\$76.60	\$88.70	\$96.30	\$102.90	\$112.50	\$129.00	\$165.60	\$207.20

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**Table 4a. Monthly Natural Gas Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)
(American Community Survey: 2007)**

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$9.70	\$9.60	\$36.10	\$8.90	\$105.60	---	---	---	---
2 room	\$25.90	\$22.80	\$46.30	\$32.10	\$78.90	\$31.30	\$13.50	\$1.00	\$24.80
3 room	\$33.90	\$52.60	\$42.20	\$51.00	\$56.10	\$60.70	\$54.10	\$41.30	\$52.90
4 room	\$71.40	\$74.50	\$76.50	\$75.90	\$72.00	\$78.70	\$73.60	\$98.40	\$45.60
5 room	\$83.20	\$87.30	\$103.80	\$100.80	\$96.50	\$105.50	\$103.80	\$106.70	\$151.40
6 room	\$100.50	\$117.70	\$131.90	\$127.10	\$135.20	\$122.20	\$120.10	\$129.60	\$117.40
7 room	\$118.10	\$126.30	\$119.20	\$128.60	\$126.90	\$125.40	\$125.80	\$111.40	\$138.00
8 room	\$118.90	\$124.10	\$135.00	\$146.70	\$131.90	\$148.00	\$120.70	\$125.70	\$133.50
9 or more	\$160.80	\$127.80	\$127.10	\$177.70	\$140.40	\$152.60	\$138.70	\$143.20	\$156.20
Total	\$86.10	\$95.90	\$109.90	\$116.60	\$117.10	\$122.30	\$121.80	\$129.80	\$145.80

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Table 4b. Monthly Electric (space heating) Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)
(American Community Survey: 2007)

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$25.30	\$25.90	\$38.50	\$42.40	\$16.70	\$16.90	\$250.00	\$57.60	---
2 room	\$29.40	\$45.70	\$35.60	\$53.60	\$67.40	\$77.90	\$97.00	\$90.00	\$80.00
3 room	\$69.80	\$49.30	\$69.90	\$61.20	\$79.20	\$95.40	\$91.70	\$90.70	\$69.90
4 room	\$70.70	\$83.90	\$88.50	\$90.20	\$111.60	\$108.50	\$120.50	\$122.70	\$93.50
5 room	\$83.50	\$121.00	\$128.30	\$148.10	\$138.00	\$142.20	\$149.10	\$156.50	\$200.80
6 room	\$156.00	\$141.00	\$151.20	\$150.40	\$163.40	\$161.00	\$172.50	\$226.50	\$171.40
7 room	\$148.30	\$143.20	\$163.80	\$185.70	\$143.50	\$183.80	\$195.80	\$196.40	\$228.00
8 room	\$165.70	\$166.40	\$177.70	\$151.80	\$194.10	\$193.50	\$201.50	\$218.60	\$245.40
9 or more	\$208.00	\$187.50	\$126.30	\$206.40	\$145.10	\$188.40	\$220.80	\$251.00	\$288.40
Total	\$86.60	\$91.60	\$111.50	\$130.10	\$139.50	\$157.20	\$183.80	\$214.80	\$256.50

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Table 4c. Monthly Electric (non-space heating) Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)
(American Community Survey: 2007)

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$13.10	\$29.50	\$30.50	\$13.80	\$57.30	\$17.50	\$30.00	\$20.00	---
2 room	\$37.30	\$53.90	\$55.10	\$53.20	\$52.80	\$70.10	\$51.80	\$201.00	\$83.00
3 room	\$40.20	\$52.40	\$51.90	\$58.90	\$67.20	\$74.10	\$91.00	\$71.70	\$44.70
4 room	\$60.40	\$68.50	\$69.90	\$72.60	\$81.20	\$91.50	\$90.20	\$82.00	\$104.90
5 room	\$73.60	\$71.30	\$78.50	\$87.10	\$92.60	\$102.60	\$109.10	\$117.20	\$130.80
6 room	\$90.20	\$85.80	\$96.60	\$99.70	\$96.10	\$105.30	\$116.00	\$129.30	\$132.10
7 room	\$98.70	\$80.40	\$98.30	\$104.60	\$109.30	\$117.70	\$126.30	\$155.40	\$173.70
8 room	\$110.30	\$101.10	\$108.10	\$120.10	\$130.00	\$122.50	\$137.30	\$157.70	\$179.60
9 or more	\$115.50	\$100.40	\$125.30	\$115.60	\$136.20	\$141.40	\$154.20	\$191.60	\$233.30
Total	\$77.20	\$76.60	\$88.70	\$96.30	\$102.90	\$112.50	\$129.00	\$165.60	\$207.20

Table 5. Average Income by Number of Rooms or Bedrooms in Housing Unit (Pennsylvania)
(American Community Survey: 2007)

Number of Rooms/Bedrooms	Average Income by Number of Rooms/Bedrooms	
	Rooms	Bedrooms
0	xxx	\$25,286
1	\$20,929	\$31,285
2	\$30,377	\$50,919
3	\$36,671	\$72,878
4	\$42,454	\$120,742
5 /a/	\$56,074	\$156,324
6	\$68,710	
7	\$85,791	
8	\$108,054	
9 /b/	\$148,268	
Total	\$74,925	\$74,925

NOTES:

/a/ For bedrooms, data is reported for 5 or more.
/b/ For rooms, data is reported for 9 or more.

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**Table 6. Distribution of Pennsylvania Housing Units by Income and Housing Unit Size (Bedrooms and Rooms)
(American Community Survey: 2007)**

Bedrooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
No bedroom	3%	1%	1%	0%	0%	0%	0%	0%	0%
1 Bedroom	18%	16%	10%	6%	5%	3%	1%	1%	1%
2 Bedrooms	27%	30%	29%	25%	22%	17%	9%	5%	4%
3 Bedrooms	40%	40%	46%	50%	52%	54%	50%	30%	19%
4 Bedrooms	8%	10%	11%	14%	17%	20%	33%	48%	48%
5 or more bedrooms	4%	3%	3%	4%	5%	5%	7%	16%	29%
Total BDS	100%	100%	100%	100%	100%	100%	100%	100%	100%

Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
1 Room	2%	1%	0%	0%	0%	0%	0%	0%	0%
2 Rooms	4%	3%	2%	1%	1%	0%	0%	0%	0%
3 Rooms	13%	11%	7%	4%	3%	2%	1%	1%	0%
4 Rooms	20%	18%	16%	13%	11%	7%	3%	1%	1%
5 Rooms	19%	24%	21%	21%	20%	16%	10%	5%	4%
6 Rooms	20%	25%	27%	29%	28%	28%	22%	11%	6%
7 Rooms	11%	10%	14%	15%	17%	21%	23%	16%	8%
8 Rooms	4%	5%	7%	9%	11%	14%	20%	24%	17%
9 Or More Rooms	5%	4%	5%	7%	8%	11%	20%	42%	63%
Total RMS	100%	100%	100%	100%	100%	100%	100%	100%	100%

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Table 7. Percentage of Households by Housing Unit Type (Pennsylvania) (American Community Survey: 2007)

Building Type	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
Mobile home	6%	7%	7%	6%	5%	3%	1%	1%	0%
1-family detached	29%	39%	49%	56%	61%	68%	78%	86%	90%
1-family attached	28%	23%	22%	20%	21%	19%	16%	10%	7%
2 apartments	7%	8%	6%	5%	4%	3%	1%	0%	0%
3 - 4 units	8%	6%	5%	4%	3%	2%	1%	0%	1%
5 - 9 units	7%	5%	4%	3%	2%	2%	1%	1%	0%
10 - 19 units	5%	3%	3%	2%	2%	1%	1%	1%	0%
20 - 49 units	4%	3%	2%	1%	1%	1%	0%	0%	0%
50 or more units	7%	5%	2%	2%	1%	1%	1%	1%	1%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

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Table 8. Home Energy Bills by Income and Housing Type (Pennsylvania)
(American Community Survey 2007)

Building Type	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
Natural Gas Bill									
Mobile home	\$73.70	\$94.50	\$94.90	\$87.20	\$87.10	\$89.50	\$96.70	\$170.00	\$200.00
1-family detached	\$115.50	\$118.50	\$125.40	\$129.80	\$132.00	\$132.40	\$126.20	\$131.70	\$152.20
1-family attached	\$102.00	\$111.90	\$128.40	\$127.70	\$114.60	\$123.10	\$117.00	\$127.90	\$102.90
2 apartments	\$76.30	\$88.80	\$73.90	\$109.00	\$99.90	\$103.50	\$136.90	\$89.10	\$67.30
3 - 4 units	\$59.70	\$51.30	\$64.80	\$52.90	\$70.70	\$68.00	\$121.60	\$117.90	\$31.90
5 - 9 units	\$38.10	\$26.70	\$46.40	\$45.50	\$34.00	\$46.70	\$43.40	\$50.20	\$32.40
10 - 19 units	\$17.70	\$32.40	\$36.10	\$34.40	\$42.30	\$39.10	\$32.40	\$31.70	\$60.00
20 - 49 units	\$15.40	\$17.20	\$29.30	\$34.20	\$15.90	\$16.70	\$36.80	\$66.30	\$8.90
50 or more units	\$13.70	\$3.30	\$29.90	\$17.00	\$12.20	\$24.20	\$23.80	\$21.00	\$2.30
Total	\$86.10	\$95.90	\$109.90	\$116.60	\$117.10	\$122.30	\$121.80	\$129.80	\$145.80
Electric (space heating) Bill									
Mobile home	\$147.10	\$135.70	\$123.50	\$135.80	\$121.20	\$184.20	\$154.10	\$175.80	\$80.00
1-family detached	\$173.00	\$160.30	\$158.70	\$172.30	\$173.50	\$179.40	\$196.40	\$228.20	\$271.70
1-family attached	\$103.40	\$113.90	\$112.60	\$141.10	\$122.60	\$142.80	\$173.00	\$194.80	\$183.60
2 apartments	\$68.50	\$89.50	\$86.80	\$91.60	\$120.00	\$127.30	\$109.20	\$160.00	---
3 - 4 units	\$77.00	\$86.30	\$95.30	\$116.10	\$113.10	\$124.60	\$110.70	\$215.30	\$267.20
5 - 9 units	\$75.30	\$68.90	\$87.70	\$81.80	\$99.50	\$102.60	\$135.70	\$112.60	\$180.00
10 - 19 units	\$102.30	\$62.50	\$74.80	\$82.00	\$70.90	\$96.70	\$120.80	\$139.20	---
20 - 49 units	\$43.30	\$43.20	\$37.70	\$54.00	\$60.10	\$84.10	\$114.40	\$48.50	\$270.00
50 or more units	\$30.70	\$26.40	\$42.70	\$39.90	\$66.50	\$73.70	\$79.20	\$107.20	\$90.80
Total	\$86.60	\$91.60	\$111.50	\$130.10	\$139.50	\$157.20	\$183.80	\$214.80	\$256.50
Electric (non-space heating) Bill									
Mobile home	\$85.60	\$79.10	\$83.40	\$95.90	\$100.50	\$108.80	\$106.40	\$101.20	\$83.20
1-family detached	\$87.20	\$81.20	\$93.10	\$97.60	\$105.60	\$114.40	\$132.80	\$168.70	\$214.70
1-family attached	\$98.10	\$88.80	\$102.90	\$110.70	\$110.40	\$118.90	\$123.60	\$158.90	\$132.30
2 apartments	\$59.20	\$74.10	\$68.50	\$84.50	\$84.40	\$93.70	\$110.00	\$100.30	\$86.00
3 - 4 units	\$44.00	\$50.80	\$57.90	\$64.70	\$60.60	\$81.30	\$75.50	\$105.30	\$134.10
5 - 9 units	\$38.00	\$40.10	\$56.10	\$59.50	\$69.70	\$71.10	\$65.50	\$54.30	\$96.70
10 - 19 units	\$34.90	\$45.40	\$48.60	\$67.50	\$55.60	\$73.10	\$76.10	\$55.90	\$60.00
20 - 49 units	\$31.30	\$55.20	\$45.50	\$47.30	\$64.10	\$69.00	\$67.90	\$104.90	\$150.00
50 or more units	\$17.10	\$30.50	\$36.50	\$39.10	\$53.80	\$51.50	\$52.70	\$40.50	\$93.90
Total	\$77.20	\$76.60	\$88.70	\$96.30	\$102.90	\$112.50	\$129.00	\$165.60	\$207.20

**CAUSE-PA Statement 1, Mitchell Miller
APPENDIX D**

Table 9. Home Energy Expenditures by Household Income Before Taxes (Northeast)

	Total	Less than \$5,000	\$5,000 - \$9,999	\$10,000 - \$14,999	\$15,000 - \$19,999	\$20,000 - \$29,999	\$30,000 - \$39,999	\$40,000 - \$49,999	\$50,000 - \$69,999	\$70,000 or more
Natural Gas										
2006 - 2007	\$656	\$217	\$291	\$386	\$554	\$510	\$535	\$647	\$732	\$888
2005 - 2006	\$640	\$278	\$319	\$370	\$576	\$533	\$596	\$645	\$723	\$823
2004 - 2005	\$596	\$242	\$304	\$347	\$522	\$535	\$568	\$602	\$620	\$783
2003 - 2004	\$540	\$167	\$290	\$344	\$478	\$508	\$522	\$549	\$536	\$726
Electricity										
2006 - 2007	\$1,225	\$467	\$491	\$721	\$820	\$924	\$1,096	\$1,144	\$1,264	\$1,742
2005 - 2006	\$1,139	\$521	\$518	\$662	\$778	\$875	\$968	\$1,101	\$1,221	\$1,623
2004 - 2005	\$1,043	\$479	\$473	\$638	\$683	\$821	\$862	\$1,023	\$1,165	\$1,473
2003 - 2004	\$954	\$360	\$457	\$602	\$676	\$749	\$845	\$948	\$1,092	\$1,341

SOURCE: Table 31, U.S. Department of Labor, Consumer Expenditures Survey (annual)

*Table 10: Basic Family Budget
in Dollars and Percentage of Federal Poverty Level by Geographic Area
(Pennsylvania)*

	1 parent/1 child		1 parent/2 children		2 parents/1 child		2 parents/2 children	
	Dollars	FPL /a/	Dollars	FPL	Dollars	FPL	Dollars	FPL
Allentown-Bethlehem-Easton	\$37,124	271%	\$44,992	262%	\$43,198	252%	\$50,697	246%
Altoona	\$32,090	234%	\$40,228	234%	\$38,225	223%	\$45,839	222%
Armstrong County	\$31,027	227%	\$39,419	230%	\$37,420	218%	\$45,016	218%
Erie	\$32,462	237%	\$40,521	236%	\$38,190	222%	\$45,804	222%
Harrisburg-Carlisle	\$35,182	257%	\$42,997	250%	\$41,303	241%	\$48,801	236%
Johnstown	\$31,187	228%	\$39,580	231%	\$37,571	219%	\$45,200	219%
Lancaster	\$34,388	251%	\$42,200	246%	\$39,837	232%	\$47,380	229%
Lebanon	\$34,014	248%	\$41,974	244%	\$39,910	232%	\$47,551	230%
Philadelphia-Camden-Wilmington	\$40,561	296%	\$48,804	284%	\$46,616	271%	\$54,488	264%
Pike County	\$39,132	286%	\$46,899	273%	\$44,866	261%	\$52,267	253%
Pittsburgh	\$33,901	248%	\$41,818	244%	\$39,815	232%	\$47,412	230%
Reading	\$34,735	254%	\$42,631	248%	\$40,242	234%	\$47,867	232%
Rural	\$33,279	243%	\$40,554	236%	\$39,489	230%	\$46,452	225%
Scranton--Wilkes-Barre	\$33,990	248%	\$42,042	245%	\$40,260	234%	\$47,992	232%
Sharon	\$32,038	234%	\$40,167	234%	\$38,166	222%	\$45,761	222%
State College	\$36,994	270%	\$44,943	262%	\$42,830	249%	\$50,408	244%
Williamsport	\$32,141	235%	\$40,248	234%	\$38,249	223%	\$45,841	222%
York-Hanover	\$34,347	251%	\$42,160	246%	\$39,795	232%	\$47,339	229%

NOTES:

/a/ FPL is the ratio of the basic family budget to 100% of the Federal Poverty Level for the particular household size. 100% of Federal Poverty Level in 2007 for a two-person household was \$13,690; for a three-person household was \$17,170; and for a four-person household was \$20,650. Basic family needs budgets were calculated for 2007.
/b/ Pennsylvania portions of multi-state metropolitan areas.

SOURCE: Economic Policy Institute. Basic Family Budget Calculator.

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Appendix A

(These Basic Family Budgets are developed through the Basic Family Budget Calculator produced by the Economic Policy Institute, http://www.epi.org/content/budget_calculator.)

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**CAUSE-PA Statement 1, Mitchell Miller
APPENDIX D**

**Appendix A.1: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition
(1 parent/1 child)**

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$317	\$709	\$339	\$210	\$272	\$430	\$3,094	\$37,124
Altoona	\$581	\$317	\$709	\$343	\$210	\$216	\$298	\$2,674	\$32,090
Armstrong County Metro FMR area	\$546	\$317	\$709	\$343	\$210	\$208	\$253	\$2,586	\$31,027
Eric	\$631	\$317	\$709	\$298	\$210	\$228	\$311	\$2,705	\$32,462
Harrisburg—Carlisle	\$722	\$317	\$709	\$339	\$210	\$250	\$385	\$2,932	\$35,182
Johnstown	\$546	\$317	\$709	\$343	\$210	\$208	\$266	\$2,599	\$31,187
Lancaster	\$715	\$317	\$709	\$298	\$210	\$248	\$368	\$2,866	\$34,388
Lebanon	\$643	\$317	\$709	\$343	\$210	\$231	\$382	\$2,834	\$34,014
Philadelphia-Camden-Wilmington	\$932	\$317	\$709	\$277	\$210	\$300	\$634	\$3,380	\$40,561
Pike County	\$923	\$317	\$709	\$343	\$210	\$298	\$461	\$3,261	\$39,132
Pittsburgh	\$666	\$317	\$709	\$318	\$210	\$236	\$368	\$2,825	\$33,901
Reading	\$715	\$317	\$709	\$298	\$210	\$248	\$396	\$2,895	\$34,735
Rural	\$598	\$317	\$691	\$390	\$222	\$220	\$335	\$2,773	\$33,279
Scranton--Wilkes-Barre	\$627	\$317	\$709	\$339	\$210	\$227	\$403	\$2,833	\$33,990
Sharon	\$583	\$317	\$709	\$343	\$210	\$216	\$291	\$2,670	\$32,038
State College	\$788	\$317	\$709	\$343	\$210	\$266	\$450	\$3,083	\$36,994
Williamsport	\$587	\$317	\$709	\$343	\$210	\$217	\$295	\$2,678	\$32,141
York--Hanover	\$713	\$317	\$709	\$298	\$210	\$248	\$367	\$2,862	\$34,347

**CAUSE-PA Statement 1, Mitchell Miller
APPENDIX D**

Appendix A.2: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition
(1 parent/2 children)

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$465	\$1,096	\$339	\$289	\$308	\$437	\$3,749	\$44,992
Altoona	\$581	\$465	\$1,096	\$343	\$289	\$251	\$328	\$3,352	\$40,228
Armstrong County Metro FMR area	\$546	\$465	\$1,096	\$343	\$289	\$243	\$304	\$3,285	\$39,419
Eric	\$631	\$465	\$1,096	\$298	\$289	\$263	\$334	\$3,377	\$40,521
Harrisburg--Carlisle	\$722	\$465	\$1,096	\$339	\$289	\$285	\$387	\$3,583	\$42,997
Johnstown	\$546	\$465	\$1,096	\$343	\$289	\$243	\$317	\$3,298	\$39,580
Lancaster	\$715	\$465	\$1,096	\$298	\$289	\$284	\$370	\$3,517	\$42,200
Lebanon	\$643	\$465	\$1,096	\$343	\$289	\$266	\$396	\$3,498	\$41,974
Philadelphia-Camden-Wilmington	\$932	\$465	\$1,096	\$277	\$289	\$336	\$672	\$4,067	\$48,804
Pike County	\$923	\$465	\$1,096	\$343	\$289	\$334	\$459	\$3,908	\$46,899
Pittsburgh	\$666	\$465	\$1,096	\$318	\$289	\$272	\$379	\$3,485	\$41,818
Reading	\$715	\$465	\$1,096	\$298	\$289	\$284	\$406	\$3,553	\$42,631
Rural	\$598	\$465	\$1,040	\$390	\$303	\$255	\$328	\$3,379	\$40,554
Scranton--Wilkes-Barre	\$627	\$465	\$1,096	\$339	\$289	\$262	\$426	\$3,503	\$42,042
Sharon	\$583	\$465	\$1,096	\$343	\$289	\$252	\$320	\$3,347	\$40,167
State College	\$788	\$465	\$1,096	\$343	\$289	\$301	\$464	\$3,745	\$44,943
Williamsport	\$587	\$465	\$1,096	\$343	\$289	\$253	\$322	\$3,354	\$40,248
York--Hanover	\$713	\$465	\$1,096	\$298	\$289	\$283	\$369	\$3,513	\$42,160

**CAUSE-PA Statement 1, Mitchell Miller
APPENDIX D**

**Appendix A.3: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition
(2 parent/1 child)**

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$514	\$709	\$482	\$286	\$320	\$473	\$3,600	\$43,198
Altoona	\$581	\$514	\$709	\$468	\$286	\$263	\$365	\$3,185	\$38,225
Armstrong County Metro FMR area	\$546	\$514	\$709	\$468	\$286	\$255	\$341	\$3,118	\$37,420
Eric	\$631	\$514	\$709	\$404	\$286	\$275	\$364	\$3,182	\$38,190
Harrisburg--Carlisle	\$722	\$514	\$709	\$482	\$286	\$297	\$432	\$3,442	\$41,303
Johnstown	\$546	\$514	\$709	\$468	\$286	\$255	\$354	\$3,131	\$37,571
Lancaster	\$715	\$514	\$709	\$404	\$286	\$295	\$397	\$3,320	\$39,837
Lebanon	\$643	\$514	\$709	\$468	\$286	\$278	\$428	\$3,326	\$39,910
Philadelphia-Camden-Wilmington	\$932	\$514	\$709	\$401	\$286	\$347	\$696	\$3,885	\$46,616
Pike County	\$923	\$514	\$709	\$468	\$286	\$345	\$494	\$3,739	\$44,866
Pittsburgh	\$666	\$514	\$709	\$447	\$286	\$284	\$413	\$3,318	\$39,815
Reading	\$715	\$514	\$709	\$404	\$286	\$295	\$431	\$3,354	\$40,242
Rural	\$598	\$514	\$691	\$524	\$308	\$267	\$389	\$3,291	\$39,489
Scranton--Wilkes-Barre	\$627	\$514	\$709	\$482	\$286	\$274	\$463	\$3,355	\$40,260
Sharon	\$583	\$514	\$709	\$468	\$286	\$264	\$357	\$3,181	\$38,166
State College	\$788	\$514	\$709	\$468	\$286	\$313	\$492	\$3,569	\$42,830
Williamsport	\$587	\$514	\$709	\$468	\$286	\$265	\$359	\$3,187	\$38,249
York--Hanover	\$713	\$514	\$709	\$404	\$286	\$295	\$396	\$3,316	\$39,795

**CAUSE-PA Statement 1, Mitchell Miller
APPENDIX D**

**Appendix A.4: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition
(2 parent/2 children)**

	Housing	Food	Childcare	Transportation	Monthly			Total	Annual Total
					Healthcare	Other Necessities	Taxes		
Allentown-Bethlehem-Easton FMR area	\$816	\$643	\$1,096	\$482	\$364	\$351	\$472	\$4,225	\$50,697
Altoona	\$581	\$643	\$1,096	\$468	\$364	\$294	\$373	\$3,820	\$45,839
Armstrong County Metro FMR area	\$546	\$643	\$1,096	\$468	\$364	\$286	\$348	\$3,751	\$45,016
Erie	\$631	\$643	\$1,096	\$404	\$364	\$306	\$372	\$3,817	\$45,804
Harrisburg—Carlisle	\$722	\$643	\$1,096	\$482	\$364	\$328	\$431	\$4,067	\$48,801
Johnstown	\$546	\$643	\$1,096	\$468	\$364	\$286	\$363	\$3,767	\$45,200
Lancaster	\$715	\$643	\$1,096	\$404	\$364	\$327	\$400	\$3,948	\$47,380
Lebanon	\$643	\$643	\$1,096	\$468	\$364	\$309	\$439	\$3,963	\$47,551
Philadelphia-Camden-Wilmington	\$932	\$643	\$1,096	\$401	\$364	\$379	\$726	\$4,541	\$54,488
Pike County	\$923	\$643	\$1,096	\$468	\$364	\$377	\$485	\$4,356	\$52,267
Pittsburgh	\$666	\$643	\$1,096	\$447	\$364	\$315	\$420	\$3,951	\$47,412
Reading	\$715	\$643	\$1,096	\$404	\$364	\$327	\$440	\$3,989	\$47,867
Rural	\$598	\$643	\$1,040	\$524	\$388	\$298	\$379	\$3,871	\$46,452
Scranton--Wilkes-Barre	\$627	\$643	\$1,096	\$482	\$364	\$305	\$481	\$3,999	\$47,992
Sharon	\$583	\$643	\$1,096	\$468	\$364	\$295	\$364	\$3,813	\$45,761
State College	\$788	\$643	\$1,096	\$468	\$364	\$344	\$497	\$4,201	\$50,408
Williamsport	\$587	\$643	\$1,096	\$468	\$364	\$296	\$366	\$3,820	\$45,841
York--Hanover	\$713	\$643	\$1,096	\$404	\$364	\$326	\$399	\$3,945	\$47,339

6/2/16 *Ray TX*

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	Docket No. R-2015-2518438
	:	
UGI Utilities, Inc. – Gas Division	:	

SURREBUTTAL TESTIMONY OF MITCHELL MILLER

ON BEHALF OF

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)**

May 25, 2016

1 **PREPARED SURREBUTTAL TESTIMONY OF MITCHELL MILLER**

2 **Q: Please state your name, occupation and business address.**

3 A: Mitchell Miller. I currently provide consulting services regarding utility programs that
4 promote the public interest with a focus on low income households. My address is 60 Geisel
5 Road, Harrisburg, PA 17112.

6 **Q: Did you previously submit testimony in this proceeding?**

7 A: Yes. I submitted *Direct Testimony*, pre-marked as CAUSE-PA Statement 1, and *Rebuttal*
8 *Testimony*, pre-marked as CAUSE-PA Statement 1-R.

9 **Q: What is the purpose of your surrebuttal testimony?**

10 A: The purpose of my surrebuttal testimony is to respond to the *Rebuttal Testimony of Chris*
11 *Ann Rossi*, UGI Statement 12-R. In particular, my surrebuttal testimony responds to Ms. Rossi's
12 rebuttal testimony as follows:

13 • **Relevance of Universal Service Programs**

14 The Universal Service issues raised in my direct testimony (CAUSE-PA St. 1),
15 rebuttal testimony (CAUSE-PA St. 1-R), and now in my surrebuttal testimony
16 (CAUSE-PA St. 1-SR) are appropriately addressed in this base rate proceeding, and
17 are relevant to the quality and accessibility of UGI's service, as well as the
18 reasonableness of UGI's rates. The issues are not foreclosed by the participation of
19 CAUSE-PA's attorneys in the non-evidentiary, comment proceeding conducted for
20 UGI's Universal Service and Energy Conservation Plan (USECP) in 2015, **before**
21 UGI's rate request was filed.

22

1 • **High Fixed Customer Charge**

2 UGI's proposal to increase the fixed charge portion of the residential bill by 104%
3 will disproportionately impact non-CAP low income customers, as evidenced by
4 extensive data from the US Energy Information Administration (EIA) presented in
5 my direct testimony. This impact is not mitigated by LIURP, which reduces
6 volumetric usage, or the current low commodity charges for natural gas.

7 • **CAP Enrollment**

8 UGI's CAP enrollment remains inadequate to address the needs of its low income
9 population and – in light of UGI's proposal to increase residential rates by nearly
10 20% - must be bolstered through increased outreach and referrals to CAP and the
11 adoption of alternative CAP enrollment methods.

12 • **LIURP**

13 UGI's 2015 increase in LIURP funding – which was raised in attempt to address
14 UGI's then-inadequate LIURP funding – does not mitigate the impact of UGI's 2016
15 request to increase its residential rate nearly 20%.

16 • **Termination Rates**

17 UGI's annual termination and reconnection rates reported by the Commission's
18 Bureau of Consumer Services (BCS) in its annual Universal Service Programs and
19 Collections Performance Report are the appropriate measure to assess UGI's
20 termination and reconnection performance.

21

1 Relevance of Universal Service Programs

2 **Q: Please summarize Ms. Rossi's testimony regarding the appropriateness of raising**
3 **Universal Service issues in this proceeding.**

4 **A: Ms. Rossi summarizes UGI's latest Universal Service Plan proceeding with regard to its**
5 **Universal Service and Energy Efficiency Plan (USECP) for January 1, 2014 through December**
6 **31, 2017, which was approved in three separate Commission Orders entered in January, June,**
7 **and September, 2015.¹ Unlike a contested adversarial proceeding with evidence and the right to**
8 **discovery, the Commission's process for addressing USECP proceedings is generally limited to**
9 **the issuance of a tentative order with the opportunity to file comments by interested individuals**
10 **and organizations. UGI's USECP proceedings followed this process and also allowed for a**
11 **limited negotiation between parties on the elimination of maximum CAP enrollment and the**
12 **adequacy of UGI's LIURP funding. Ms. Rossi asserts that the issues raised in this past**
13 **proceeding with respect to its USECP were resolved, and that the recommendations made in**
14 **direct testimony by CAUSE-PA, CEO, OCA, and I&E regarding structural changes to UGI's**

¹ In her rebuttal testimony, Ms. Rossi incorrectly summarized the relationship between CAUSE-PA and PULP. Ms. Rossi asserts that CAUSE-PA is "the policy advisor to PULP," and that "PULP, like CAUSE-PA is a component of Regional Housing Legal Services which shares with CAUSE-PA both staff and a common mission of advocating for utility services for residential customers of limited economic means." (UGI St. 12-R at 4-5). The implication Ms. Rossi makes here is that PULP's submission of comments in UGI's USECP proceeding is the same as CAUSE-PA's participation in that proceeding, and that PULP and CAUSE-PA are one in the same. As support, Ms. Rossi cites a video highlighting the accomplishments of CAUSE-PA created by the Pennsylvania Legal Aid Network in 2015 to celebrate CAUSE-PA's receipt of an Excellence Award for its utility advocacy.

I am advised by counsel of the following facts, of which I was largely aware through my work with PULP and CAUSE-PA over the past several years:

CAUSE-PA and PULP are not one in the same. Rather, CAUSE-PA is a client of PULP – much the same way that UGI is a client of Post & Schell, PC; the UGI Industrial Intervenors are a client of McNees, Wallace, and Nurick LLC; and RESA is a client of Buchanan, Ingersoll & Rooney. CAUSE-PA does not share employees with PULP and is not associated or organized under the umbrella of Regional Housing Legal Services. As explained in CAUSE-PA's Petition to Intervene, CAUSE-PA is an unincorporated association of low and moderate income individuals who are committed to ensuring low income households have stable access to safe, affordable utility service. CAUSE-PA retained PULP to represent it in these proceedings.

1 Universal Service programs “are largely unrelated to the proposed rate increase and the rates
2 resulting therefrom.” (UGI St. 12-R at 6-7). Ms. Rossi goes so far as to say that “all of the
3 efforts to review, respond, weigh, and decide the universal services program issues raised by
4 [CAUSE-PA, CEO, OCA and I&E] result in an inefficient expenditure of resources by the
5 parties and the Commission itself.” (UGI St. 12-R at 7).

6 **Q: How do you respond to Ms. Rossi’s assertion that UGI’s Universal Service
7 programming is not relevant to its request to increase its base rate?**

8 **A:** She is incorrect. The issues raised in this proceeding regarding UGI’s Universal Service
9 programming, and the impact of rates on UGI’s low income population, are fundamental to the
10 Commission’s assessment of whether to approve a nearly 20% hike in residential rates. These
11 issues could not possibly have been addressed in a proceeding that concluded prior to UGI’s base
12 rate proceeding having commenced.

13 As I explained at length in my direct testimony, UGI’s CAP enrollment has lagged
14 behind that of other utilities for well over decade, and its terminations for low income customers
15 has consistently outpaced that of comparable natural gas utilities across the state. (CAUSE-PA
16 St. 1, at 9 (T1) & 14). In the Commission’s 2015 assessment of UGI’s USECP, interested parties
17 were limited to the submission of comments and reply comments, and I am advised by counsel
18 that commenting parties are without any discovery rights to uncover practices and procedures
19 which contribute to UGI’s low CAP participation and high termination rates.

20 Furthermore, in suspending UGI’s request for a rate increase, the Commission ordered
21 that an investigation be conducted, and that it “include consideration of the lawfulness, justness,
22 and reasonableness of UGI Utilities, Inc.’s existing rates, rules, and regulations.” (Suspension
23 and Investigation Order at 2). The provision of universal services are an integral part of UGI’s

1 rules and regulations governing service to low income customers, and cannot be ignored in
2 assessing the reasonableness of the rate increase requested by UGI in this proceeding. As I
3 explained in my direct testimony, the energy burden of low income households is already very
4 high, by many estimates exceeding 30% of a low income household's income. (CAUSE-PA St. 1
5 at 10-11).² Raising rates further will exacerbate the already-high energy burden of vulnerable
6 households, placing them at greater risk of financial and physical harm - sacrificing food or
7 medicine to heat their home. (CAUSE-PA St. 1 at 11). In assessing whether to grant an increase
8 in rates – including both the size of the increase and any associated terms – the Commission
9 must be sure that there are adequate safeguards in place for economically vulnerable households
10 to ensure that they are able to access utility service without sacrificing other basic life
11 necessities. It is impossible to do so without also examining the structure and delivery of UGI's
12 universal service programming to address widespread energy unaffordability.

13

² After the submission of my direct testimony, the American Council for an Energy-Efficiency Economy (ACEEE) issued a report on April 20, 2016, which concluded that “low-income, African American, Latino, low-income multifamily, and renter households all spend a greater proportion of their income on utilities than the average family.” Ariel Dreihobl & Lauren Ross, ACEEE, *Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities* (April 2016), available at <http://aceee.org/sites/default/files/publications/researchreports/u1602.pdf>. The report finds:

High energy burden can cause very real mental and physical health problems for household members due to thermal discomfort, inadequate lighting, unsafe housing conditions, and constant financial and social stress. Individuals who experience high energy burdens may cut back on necessary energy use and inadequately heat, cool, and light their homes, which can result in many negative health consequences.

Studies have found that living in homes that are not properly heated or cooled increases cases of asthma, respiratory problems, heart disease, arthritis, and rheumatism. Children and the elderly are more susceptible to these health impacts. ...

...
The troubling reality is that many households resort to high-cost payday lending in order to pay their utility bills, which can further exacerbate the cycle of poverty. A 2012 study found that paying utility bills was the most common reason why individuals took out a payday loan. These loans are small, short-term loans with high interest rates that can make repayment difficult and costly. By addressing energy affordability, policymakers can help to break the cycle of poverty and increase economic development, educational achievement, and public health.

Id. at 13.

1 High Fixed Customer Charge

2 **Q: Please summarize Ms. Rossi's rebuttal testimony regarding UGI's fixed customer**
3 **charge to which you would like to respond.**

4 A: Ms. Rossi spends considerable time in her rebuttal testimony responding to my testimony
5 (and that of OCA witness Roger Colton and CEO witness Gene Brady), which described the
6 disproportionate impact that UGI's proposal for a drastic increase in the fixed charge portion of
7 residential bills (from \$8.55 to \$17.50) will disproportionately impact low income ratepayers,
8 who on average use less natural gas than higher income customers. (UGI St. 12-R at 7-8;
9 CAUSE-PA St. 1 at 16-18; OCA St. 4 at 28; CEO St. 1 at 5). In response, Ms. Rossi points to
10 data on CAP customer usage rates, which tend to be higher than other residential customers, and
11 argues that raising fixed charges would actually benefit low income customers as a whole based
12 on higher CAP customer usage. (UGI St. 12-R at 7-8). She also points to the fact that the
13 community based organizations which administer UGI's universal service programming "are
14 required to identify high-use CAP customers and potential CAP participants to provide these
15 customers with an energy education session," and that this targeting – as well as LIURP as a
16 whole - can further offset the rate impact on low income customers (UGI St. 12-R at 9). She
17 concludes that Mr. Colton and I afforded "insufficient weight to the impact of the Company's
18 CAP in mitigating the impact of a higher fixed charge on low income customers." (UGI St. 12-R
19 at 9).

20 **Q: How do you respond to Ms. Rossi's conclusions regarding the impact of UGI's**
21 **proposed rate structure on low income customers?**

22 A: I agree with Ms. Rossi in small part with regard to her final conclusion: Enrollment in
23 CAP is critical to mitigate the impact of a rate increase on low income customers. It was not my

1 intention to give “insufficient weight” to the role of CAP in mitigating the impact of UGI’s
2 proposed rate increase on low income customers. (CAUSE-PA St. 1, at 20).

3 That said, Ms. Rossi is wrong in pointing to CAP customer usage as evidence that low
4 income customers – as a group - have higher than average usage. (UGI St. 12-R at 8). CAP
5 customers represent just 9% of UGI’s estimated low income population. (CAUSE-PA St. 1, at 8
6 & note 4). It is unsurprising that this small group of low income customers have higher than
7 average usage, as those with the highest usage – and correspondingly the highest bills – are most
8 likely to have been readily identified as payment troubled and likely to have navigated the
9 system to reach assistance through CAP. Furthermore, because UGI CAP customers pay only a
10 percentage of their income as their CAP bill they are generally unaffected by a fixed customer
11 charge increase. This is not the case for UGI’s confirmed low-income customers who are not
12 enrolled in CAP.

13 As I explained in direct testimony, high fixed charges will have a significant and negative
14 impact on the 91% of estimated low income households in UGI’s service territory which are *not*
15 enrolled in CAP, and who are at the highest risk for termination³. (CAUSE-PA St. 1, at 10-11).
16 It is this portion of the population – who pay unsubsidized full tariff rates – that will suffer the
17 most from UGI’s high fixed charge proposal.

18 As I touched upon briefly in direct testimony, the United States Department of Energy
19 reports that low income households in the Northeast region – which includes Pennsylvania - use
20 less natural gas than households with higher incomes (CAUSE-PA St 1, at 18, note 31). This
21 same data also shows that low income households pay more per square foot for natural gas

³ Low income customers are terminated at a rate of 19% overall: 16% for low income CAP customers and 22% for non-CAP customers. (CAUSE-PA St. 1, at 8, 11-12).

1 service.⁴ This duality is attributable to the fact that low income households most often reside in
2 smaller homes, with fewer square feet and older, less efficient appliances and infrastructure.⁵ So,
3 while low income households use less natural gas overall, their usage is often less efficient and
4 costs more per square foot. If a larger portion of a non-CAP customer bill is fixed each month,
5 the opportunity to adopt cost-effective energy efficiency measures to reduce the household
6 energy burden dwindles, thus contributing to greater inequity in access to natural gas service
7 across the service territory.⁶

8 Ms. Rossi is also wrong in her conclusion that the impact of high fixed charges on non-
9 CAP, low income populations is mitigated through targeted enrollment and outreach to CAP
10 customers for LIURP remediation. Again, she misses the point: The concern is for the 91% of
11 estimated low income customers who are not enrolled in CAP. Targeting CAP customers for
12 LIURP enrollment gets at the highest overall users enrolled in CAP, which is a praiseworthy
13 goal. But it does not address the non-CAP customer dilemma, whereby their usage is lower than
14 average as a result of smaller living spaces, but their homes are less efficient as a result of poor
15 housing conditions. In this way, Ms. Rossi's explanation that UGI targets CAP customers for

⁴ US DOE, Residential Energy Consumption Survey, T.CE2.2 & T.CE2.7, available at <https://www.eia.gov/consumption/residential/data/2009/index.cfm?view=consumption>.

⁵ Ariel Dreihobl & Lauren Ross, ACEEE, Lifting the High Energy Burden in America's Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities (April 2016), available at <http://aceee.org/sites/default/files/publications/researchreports/u1602.pdf>.

⁶ The ACEEE report succinctly explains the impact of higher fixed charges on the ability of low income households to adopt energy efficiency which will effectively reduce their overall energy burden:

A recent trend toward raising fixed monthly charges on customer utility bills also threatens energy affordability, especially for low-income customers. Fixed charges are generally applied to all bills equally ... Shifting costs to fixed charges and away from the amount of energy use itself acts as a disincentive for energy efficiency and reduces the ability of the customer to save money by conserving energy. Increases in energy bills to higher fixed charges pose a real threat to already overburdened households, negating their efforts to avoid high energy bills by reducing consumption. Strategies aimed at improving energy affordability must also address the issue of rising fixed charges and their impacts on low-income customers.

Id. at 12.

1 LIURP enrollment only further underscores the lack of assistance available to the vast majority
2 of low income customers, and in no way mitigates the likely negative impact that increasing the
3 fixed charge portion of a customer's bill will have on the vast majority of low income customers.

4 **CAP Enrollment**

5 **Q: Please summarize Ms. Rossi's testimony with regard to the adequacy of UGI's CAP**
6 **enrollment to which you wish to respond.**

7 A: Rather than offer an explanation or justification for its persistently low CAP enrollment
8 rates (CAUSE-PA St. 1 at 8-9, 14, 21-23), Ms. Rossi focuses her rebuttal testimony on
9 responding to my recommendations to mitigate the overarching enrollment issue. (CAUSE-PA
10 St. 1, at 23-24; UGI St. 12-R at 18-19). In response to my first two recommendations – that
11 CBOs be empowered to perform CAP outreach, and that UGI comply with statutory referral
12 requirements – Ms. Rossi conceded that UGI “is willing to agree to provide its CBOs a list of
13 customers who meet CAP eligibility criteria so that additional solicitation efforts can take place,”
14 but argued that UGI should not be required to “screen or offer CAP on every credit or billing
15 related call.” (UGI St. 12-R at 18-19). Ms. Rossi asserts: “To add routine CAP screening and
16 scripts to every credit or billing related call would make the Company's handling of customer
17 calls less efficient.” (UGI St. 12-R at 19). Finally, in response to my third recommendation that
18 UGI enable CAP enrollment over the phone, Ms. Rossi states that UGI allows phone enrollment
19 to LIHEAP recipients, but that all other CAP enrollment is handled by local CBOs, which
20 typically “require in-person enrollment for verification of income and/or the completion of a
21 high usage questionnaire and in-person energy education counseling.” (UGI St. 12-R at 19). Ms.
22 Rossi asserts that, for this reason, “the Company cannot agree to Mr. Miller's recommendation
23 for telephonic CAP enrollment for all customers.” (UGI St. 12-R at 19).

1 **Q: How do you respond to Ms. Rossi's assertions regarding UGI's adoption of your**
 2 **recommendations to bolster CAP enrollment.**

3 A: First, I support UGI's concession that it will provide CBOs with "a list of customers who
 4 meet CAP eligibility criteria so that additional solicitation efforts can take place," because any
 5 efforts to enhance UGI's low CAP enrollment are welcomed. However, I do not believe that it
 6 goes far enough to actually increase CAP enrollment levels. As I noted in my direct testimony,
 7 UGI's CAP contract does not provide incentive or compensation for CBOs to engage in positive
 8 outreach to potential CAP customers. (See CAUSE-PA St. 1 at 22-23, Proprietary Version). So,
 9 providing a list to CBOs of potentially eligible CAP customers, without fixing the underlying
 10 incentive issue, will likely not bolster additional outreach activities.

11 Ms. Rossi responds to my criticism of UGI's CBO contract, asserting that the contract
 12 provisions regarding compensation to its CBOs "have nothing to do with CBO or Company
 13 outreach efforts for CAP enrollment." (UGI St. 12-R at 32). She claims: "It is outlandish to
 14 conclude that the Company prevents its CBOs from performing outreach simply because the
 15 vendor contract requires the CBO to have that requisite subject matter expertise independent of
 16 training the Company may provide." (UGI St. 12-R at 32). But Ms. Rossi does not provide any
 17 evidence that UGI otherwise incentivizes or compensates CBOs to conduct marketing or
 18 program outreach – or that UGI conducts such outreach on its own.⁷ The fact is, apart from an
 19 annual CAP mail solicitation targeted at a small portion of UGI's low income customer base,
 20 UGI has produced nothing to show that UGI's CBOs provide any proactive outreach to

⁷ Ms. Rossi asserts that it was "unnecessary and inappropriately intrusive" to inquire about or analyze the level of proactive customer outreach included in its CBO contracts. (UGI St. 12-R at 32). Given that ratepayers fully fund UGI's universal service programs, it is hard to imagine how the required tasks and compensation of CBOs is beyond reproach. Whether a CBO is compensated for a given task – in this instance, program outreach – is part and parcel to determining whether the CBO conducts that task and, in turn, whether UGI is adequately administering its universal service programs to meet the needs of its low income customers.

1 potentially eligible customers. (See CAUSE-PA St. 1 at 23). Providing a list to CBOs – without
2 also empowering the CBO to act on the information – while good, is likely insufficient to drive
3 additional enrollment in CAP.

4 Turning to Ms. Rossi’s assertion that it would be “inefficient” for UGI to refer all credit
5 or billing related calls to CAP, I want to take this opportunity to clarify that it was not my
6 intention to include *any* call which asks about an issued bill, but rather only those calls in which
7 a customer requests assistance in paying a bill, asks about a payment arrangement, or otherwise
8 suggests in the course of the conversation that they are having difficulty paying their bill. This
9 recommendation is not only a best practice to reduce customer bills to an adequate level ensure
10 affordability, manage arrears, and minimize uncollectible expenses, it is also a statutory
11 requirement.⁸ Title 66, Chapter 14 provides:

12 Public utility duties.

13 When a customer or applicant contacts a public utility to make a payment a
14 payment agreement as required by section 1410 (relating to complaints filed with
15 commission), the public utility shall:

- 16 (1) Provide information about the public utility’s universal service programs, including a
17 customer assistance program.
18 (2) Refer the customer or applicant to the universal service program administrator of the
19 public utility to determine eligibility for a program and to apply for enrollment in a
20 program.⁹

21 To Ms. Rossi’s point, providing a referral to all callers with credit and billing related issues may
22 be “less efficient” for certain call center metrics – such as the time spent on an individual call,
23 but the result will be to boost enrollment in CAP and more effectively address a customer’s
24 payment-related issue. Of course, referring credit and billing related calls to appropriate

⁸ 66 Pa. C.S. § 1410.1(1)-(2).

⁹ Id.

1 universal service programs would also ensure that UGI fulfills the statutory referral requirements
 2 contained in Chapter 14.

3 Finally, I am perplexed by Ms. Rossi’s assertion that UGI cannot offer CAP enrollment
 4 over the phone because “CBOs require in-person enrollment for verification of income and/or
 5 the completion of a high usage questionnaire and in-person energy education counseling.” (UGI
 6 St. 12-R at 19). First, I am not suggesting that UGI forgo verification of income and eligibility,
 7 simply that UGI permit routine ways other than in person appointments to allow eligible
 8 households to verify their eligibility. Ms. Rossi does not assert that CBOs are unable to conduct
 9 enrollment over the phone, or through mail/fax, and it is not a provision contained within its
 10 CBO contract for CAP services.¹⁰ In fact, at least one of UGI’s CBOs also administer PPL
 11 Electric’s CAP, which relies primarily on phone and mail-based applications as opposed to in
 12 person appointments.¹¹

13 Adult low income household members often juggle multiple jobs without paid leave, rely
 14 on infrequent and inadequate public transportation service, and have little access to affordable
 15 child care services.¹² To attend an in-person appointment as a condition to enrolling in CAP, low

¹⁰ See CAUSE-PA St. 1, Appendix B (CONFIDENTIAL Response of UGI to CAUSE-PA II-3, attachment 3-1, at para. 1).

¹¹ See APPRISE, PPL Electric Utilities Universal Service Programs: Final Evaluation Report, at 14 (Oct 2014), available at https://www.puc.state.pa.us/General/pdf/USP_Evaluation-PPL.pdf; see also Comm’n on Economic Opportunity (CEO), *Utility and Heating Assistance*, http://www.ceopeoplehelpingpeople.org/index.asp?SEC=80A44C22-17BD-49BA-AAFF-1D512CA14C7F&Type=B_PRGSRV (listing both UGI’s CAP and PPL’s OnTrack as programs CEO administers);

¹² BCS explains in its 2014 Report on Universal Service Programs and Collections Performance that most households enrolled in universal service programs – including CAP – have income from employment, disability benefits, or pension benefits. They explain that even at full time employment, these households are well within the income guidelines for CAP:

In 2014, minimum wage was \$7.25 per hour, the same as it has been since 2011. Annual income for a wage earner who works at a minimum-wage job is \$15,080. A typical 2014 CAP customer (household) has an income of approximately \$13,100, which places these households’ incomes at 66 percent of FPIG (for three persons) for 2014, and 65 percent for 2015.

1 income customers must overcome these significant barriers – taking time away from wage
2 earning hours. Indeed, this is a perverse result that could be mitigated by allowing customers to
3 enroll in CAP over the phone – as is already widely done in other utility service territories across
4 the Commonwealth of Pennsylvania.

5 **LIURP**

6 **Q: Please summarize Ms. Rossi’s testimony with respect to LIURP to which you wish to**
7 **respond.**

8 **A: In relevant part, and in response to my recommendation that UGI increase its budget for**
9 **LIURP to help offset the impact of its rate increase on low income customers, Ms. Rossi asserts**
10 **that requiring UGI to increase its LIURP budget “would require the Company to re-evaluate the**
11 **resources needed to ensure that it is capable of performing the increased number of LIURP**
12 **weatherization jobs, and if it is capable, to increase the amount of LIURP funding to be**
13 **recovered through the Universal Service Program rider.” (UGI St. 12-R at 25). She concludes**
14 **that “[i]t is premature to make those assessments” and notes that UGI’s needs assessment “has**
15 **not changed” since its 2015 LIURP increase. (UGI St. 12-R at 25, 26).**

16 Ms. Rossi also takes issue with my assertion that UGI’s completion of just six (6) LIURP
17 jobs since the start of 2016, arguing that 3 months (a full quarter of the year) is not sufficient
18 time to gage whether UGI is adequately administering its LIURP to address the need within its
19 service territory. (UGI St. 12-R at 25). Shortly after making this assertion, Ms. Rossi rejects
20 CEO witness Gene Brady’s recommendation to carry over unspent LIURP dollars year to year.
21 (UGI St. 12-R at 26- 27).

1 **Q: How do you respond to Ms. Rossi's assertions with respect to your recommendation**
2 **to increase funding?**

3 A: The intervening event since UGI's last LIURP needs assessment is its proposal of a 20%
4 increase in residential rates. While Ms. Rossi asserts that the needs of UGI's customers "has not
5 changed" since its 2015 needs assessment, the energy efficiency needs of UGI's low income
6 customers will change dramatically after the introduction of such a significant rate increase.
7 Thus, incorporation of increased LIURP funding in light of the proposed rate increase is not
8 premature. To the contrary, enhanced low income usage reduction is critical to offset the
9 inevitable growth in energy burden facing UGI's low income customers.

10 In turn, Ms. Rossi's assertion that changing the LIURP budget at this time would pose an
11 unjustified burden on UGI to evaluate the resources necessary to increase its LIURP production
12 or to calculate the LIURP recovery mechanism is unfounded and wholly unsupported. She
13 points to no data or analysis to suggest that this sort of computation is burdensome. Given that
14 this is a base rate case, which will establish the recovery mechanism for universal service
15 programs going forward, it is hard to imagine that UGI will have difficulty making such an
16 adjustment.

17 Finally, in responding to Ms. Rossi's claim that its first quarter LIURP performance is
18 not relevant or somehow statistically invalid to UGI's LIURP performance, I will refer back to
19 my direct testimony which shows that UGI's poor LIURP performance is demonstrated over
20 years – not simply the first quarter of 2016. There, I pointed out that UGI completed just 782
21 LIURP jobs over the course of 5 years – serving an average of just 156 homes each year, hardly
22 enough to serve the estimated 7,449 households in need of LIURP services. (CAUSE-PA St. 1
23 at 24-25). And, UGI has consistently underspent its LIURP budget year over year. In 2014, UGI

1 spent just 76% its 2014 LIURP budget. (CAUSE-PA St. 1 at 25). Indeed, the fact that UGI only
2 completed six (6) LIURP jobs in the first quarter of 2016 – coupled by its repeated poor LIURP
3 performance and Ms. Rossi’s explicit refusal to carry over unspent LIURP budgets – is
4 illustrative of the need for heightened scrutiny of UGI’s LIURP as a whole to ensure that the
5 program is adequately funded and appropriately administered to achieve meaningful usage
6 reduction for its low income participants.

7 **Terminations**

8 **Q: Please summarize Ms. Rossi’s testimony with respect to terminations to which you**
9 **wish to respond.**

10 A: In relevant part, Ms. Rossi asserts that the termination and reconnection statistics it
11 reports to the Commission should be set aside in favor of examining the Cold Weather Interim
12 Procedure Report. (UGI St. 12-R at 34). Ms. Rossi asserts: “The CWIP report demonstrates that
13 the number of customers without natural gas service after termination is far lower than what a
14 review of the termination and reconnection rates would suggest.” (UGI St. 12-R at 34, Exhibit
15 CAR-5). Ms. Rossi highlights findings from the report that – of the 9,968 terminated customers
16 – “5% were determined to be using alternative fuel sources, with the vast majority of terminated
17 customers having either restored service prior to commencement of the survey (3,668), restored
18 post commencement of the survey (4,825), or no longer living at the service location (486).”
19 (UGI St. 12-R at 34).

20 **Q: How do you respond to Ms. Rossi’s assertion that the CWIP report is more**
21 **appropriate to measure termination and reconnection rates?**

22 A: First, the CWIP report is based on a snapshot in time, and does not allow for the
23 depth of analysis possible when making an apples-to-apples comparison of termination and

1 reconnection rates year over year for the last 10 years, as I did in direct testimony. My analysis
 2 found “over the last decade, UGI’s low income termination rates have consistently and
 3 significantly outpaced the average NGDC termination rate, yet – with the exception of just one
 4 year - UGI’s reconnections have been, consistently and significantly lower than industry
 5 average.” (CAUSE-PA St. 1, at 14, T.1). The CWIP report is also not subject to regulatory
 6 standards or definitions for data collection and reporting categories.¹³

7 But even if the CWIP report were an adequate or appropriate substitute for assessing
 8 yearly termination and reconnection data, which I do not believe it is, the report nonetheless
 9 presents a troubling picture. With regard to UGI’s 2014 CWIP report, Ms. Rossi asserted that
 10 approximately 5% of the 9,968 terminated customers surveyed (nearly 500 customers) “were
 11 determined to be using alternative energy sources.” (UGI St. 12-R at 34). In other words, nearly
 12 500 customers were known to UGI as using potentially unsafe heating alternatives, including
 13 plug-in electric space heaters, generators, and other hazardous and/or high usage electric
 14 alternatives. (See CAUSE-PA St. 1, at 13 & n. 19). Ms. Rossi goes on to assert that the 2014
 15 CWIP report showed “the vast majority of terminated customers having either restored service

¹³ The extent of the regulations governing the CWIP report are included in subsections (h) and (i) of Chapter 56 of the Public Utility Code. See 52 Pa. Code § 56.100 (Winter Termination Procedures):

(h) *Survey of terminated heat related accounts.* For premises where heat related service has been terminated within the past year for any of the grounds in § 56.81 (relating to authorized termination of service) or § 56.98, electric distribution utilities, natural gas distribution utilities and Class A water distribution utilities shall, within 90 days prior to December 1, survey and attempt to make post-termination personal contact with the occupant or a responsible adult at the premises and in good faith attempt to reach an agreement regarding payment of any arrearages and restoration of service.

(i) *Reporting of survey results.* Electric distribution companies, natural gas distribution utilities and Class A water distribution utilities shall file a brief report outlining their pre-December 1 survey and personal contact results with the Bureau of Consumer Services on February 1 of each year to reflect any change in the status of the accounts subsequent to the December 15 filing. For the purposes of the February 1 update of survey results, the public utility shall attempt to contact by telephone, if available, a responsible adult person or occupant at each residence in a good faith attempt to reach an agreement regarding payment of any arrearages and restoration of service.

Beyond these basic requirements, there are no standards or guidelines for the utility’s compliance.

1 prior to commencement of the survey (3,668), restored post commencement of the survey
2 (4,825), or no longer living at the service location (486).” (UGI St. 12-R at 34). Ms. Rossi
3 accounts for 8,979 of the 9,968 terminated customers, leaving 989 low income customers whose
4 families weathered the record cold 2014 winter without the use of their central heating system. It
5 is astounding that all 989 of these customers were contacted by UGI employees as required in the
6 Public Utility Code, but yet – with all the options available through the various universal service
7 programs - UGI was still unable to reach a good faith agreement with the terminated customer
8 regarding payment of any arrearages and restoration of service, as I am advised by counsel is
9 required by the section of Code governing the winter survey.¹⁴

10 What the CWIP report does not show are the number of customers who persist without
11 the use of their central heating system in the intervening years, as it only reports the number of
12 customers terminated within a single year.¹⁵ Likewise, it fails to show the number of customers
13 who rely on natural gas for essential, non-heating uses, such as gas cooking ranges. These
14 customers are impacted significantly by the loss of natural gas service, and should not be
15 ignored.

16 **Q: Does this conclude your surrebuttal testimony?**

17 **A: Yes.**

¹⁴ 52 Pa. Code § 56.100(h).

¹⁵ 52 Pa. Code § 56.100(h).

6/2/16 HbgTK

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al., :

v. :

UGI Utilities, Inc. – Gas Division :

Docket No. R-2015-2518438

DIRECT TESTIMONY OF MARIELLE MACHER, ESQ.

ON BEHALF OF

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)**

April 12, 2016

PUBLIC VERSION

CONFIDENTIAL INFORMATION REDACTED

PUBLIC

1 **PREPARED DIRECT TESTIMONY OF MARIELLE MACHER, ESQ.**

2 **Q: Please state your name, occupation and business address.**

3 A: Marielle Macher. I am an attorney employed at the Community Justice Project, 118
4 Locust Street, Harrisburg PA 17101.

5 **Q: Briefly outline your education and professional background.**

6 A: I graduated from Cornell University, *summa cum laude*, in 2008, and from Harvard Law
7 School, *cum laude*, in 2011. From 2011-2012, I clerked for Judge Thomas I. Vanaskie on the
8 U.S. Court of Appeals for the Third Circuit. From 2012-2014, I was a Skadden Fellow at the
9 Washington Lawyers' Committee for Civil Rights & Urban Affairs ("WLC"), where I focused
10 primarily on representing the victims of foreclosure rescue and loan modification scams. Many
11 of my clients at WLC were immigrants with limited English proficiency.

12 In 2014, I became a staff attorney at the Community Justice Project ("CJP") in
13 Harrisburg, Pennsylvania, where I handle workers' rights, language access, consumer rights, and
14 other civil rights matters. Most of my practice focuses on representing immigrant, limited
15 English proficient clients in Northeastern Pennsylvania and the Berks County area. My resume is
16 attached as Appendix A.

17 **Q: Please describe your experience working with immigrant and foreign-born**
18 **populations.**

19 At WLC, I represented victims of foreclosure rescue and loan modification scams. These
20 scams often prey on vulnerable, limited English proficient individuals. As a result, many of my
21 clients were immigrants with limited English proficiency.

PUBLIC

1 At CJP, we have outreach offices in Hazleton and Reading that focus on outreach to the
2 Hispanic communities. Nearly all of our clients from our Hazleton and Reading offices are
3 immigrants with limited English proficiency. I handle all of the litigation that comes from our
4 outreach in these offices, including workers' rights, language access, and other civil rights matters.

5 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

6 A: No.

7 **Q: For whom are you testifying in this proceeding?**

8 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
9 Efficiency in Pennsylvania ("CAUSE-PA").

10 **Q: What is the purpose of your testimony?**

11 A: It is my understanding that CAUSE-PA intervened in this proceeding to ensure that low
12 income customers are able to connect to, maintain, and afford natural gas service, notwithstanding
13 UGI's proposed rate increase.

14 In my testimony, I will address aspects of UGI's service which impact the ability for
15 limited English proficient (LEP) and immigrant populations to access and maintain natural gas
16 service. I will first explain the impact that UGI's rate increase will have on immigrant
17 populations. I will then discuss the laws and regulation that apply to UGI, assess whether UGI's
18 policies are sufficient to meet the applicable standards, and offer recommendations for how UGI
19 can improve its policies to best serve its LEP and immigrant customers.

1 **Q: How will UGI's proposed rate increase impact immigrant populations in UGI's**
2 **service territory?**

3 A: On average, limited English proficient individuals earn lower wages than their English
4 proficient counterparts.¹ Thus, any rate increase would have the tendency to disproportionately
5 impact immigrant communities in which there are large numbers of limited English proficient
6 individuals.²

7 **Q: Can you summarize the laws and regulations governing language access?**

8 A: Yes. First, the Public Utility Commission sets forth basic translation requirements for
9 termination notices in 52 Pa. Code § 56.91:

10 "A notice of termination must include, in conspicuous print, clearly and fully the
11 following information when applicable: ...

12 (17) Information in Spanish directing Spanish-speaking customers to the number
13 to call for information and translation assistance. Similar information shall be
14 included in other languages when census data indicates that 5% or more of the
15 residents of the utility's service territory are using that language."

16 I am also aware that UGI receives federal funds through the Low-Income Home Energy
17 Assistance Program (LIHEAP). As a recipient of these federal LIHEAP dollars, UGI's
18 language access responsibilities are more extensive than the requirements contained in the PUC's
19 regulations. Title VI of the Civil Rights Act of 1964 provides:

20 No person in the United States shall, on the ground of race, color, or
21 national origin be excluded from participation in, be denied the benefits

¹ "In 2013, about 25% of LEP individuals lived in households with an annual income below the official federal poverty line – nearly twice as high as the share of English-proficient persons (14 percent)." Jie Zong & Jeanne Batalova, *The Limited English Proficient Population in the United States*, Migration Policy Institute Journal (July 8, 2015), <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>.

² *Id.* ("In 2013, about 50% of immigrants (20.4 million) were LEP, compared to 2 percent of the U.S.-born population.")

1 of, or be subject to discrimination under any program or activity receiving
2 Federal financial assistance.³

3 The Title VI protection against discrimination based on national origin applies when an
4 individual is unable or has a limited ability to speak, read, write or understand English – in other
5 words, the person is limited English proficient or LEP.⁴ Title VI responsibilities extend to
6 contractors and grant recipients of federal programs,⁵ such as LIHEAP. As a LIHEAP vendor,
7 UGI is required to “take reasonable steps to ensure meaningful access” its services.⁶ The steps
8 that are “reasonable” for a covered entity vary, depending on the size of the population served
9 and frequency in which they have or should have contact with an LEP person of that population.
10 Critical to this determination is an assessment of the consequences of not providing adequate
11 language access services.⁷ In this instance, UGI’s service is an essential component to a healthy,
12 safe home, and the consequences of providing insufficient access to service may be severe, so
13 the requirements of Title VI are great.⁸

14 There are two main components to providing language access: (1) oral interpretation and
15 (2) written translation. With respect to oral interpretation, the Department of Health and Human
16 Services (HHS) provides that use of bilingual employees to interpret is acceptable, but explains

³ 42 U.S.C. § 2000d.

⁴ *Lau v. Nichols*, 414 U.S. 563, 569 (1974); *Sandoval v. Hagan*, 197 F.3d 484, 510-11 (11th Cir. 1999) (holding that English-only policy for driver’s license applications constituted national origin discrimination under Title VI), rev’d on other grounds, 532 U.S. 275 (2001); *Almendares v. Palmer*, 284 F. Supp. 2d 799, 808 (N.D. Ohio 2003) (holding that allegations of failure to ensure bilingual services in a food stamp program could constitute a violation of Title VI).

⁵ 45 C.F.R. § 80.3(b)(2).

⁶ Dep’t Health & Human Services (HHS), Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, <http://www.hhs.gov/civil-rights/for-individuals/special-topics/limited-english-proficiency/guidance-federal-financial-assistance-recipients-title-VI/index.html>.

⁷ *Id.*

⁸ *Id.*

1 that employees should be qualified to provide interpretation services.⁹ Hiring staff interpreters
2 or contracting for in-person interpreters are also viable options to meet the requirement. Use of
3 telephone interpreter lines may be used, too, but nuances in language and non-verbal
4 communication can be lost. HHS warns in guidance that “where documents are being discussed,
5 it may be important to give telephonic interpreters adequate opportunity to review the document
6 prior to the discussion and any logistical problems should be addressed.”¹⁰

7 With respect to written translation, the general rule is that covered entities must provide
8 written translation of any vital documents “for each LEP language group that constitutes five
9 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to
10 be affected or encountered.”¹¹

11 **Q: Does Title VI extend to all of UGI’s services, or only to its services related to**
12 **LIHEAP?**

13 **A:** Title VI requirements apply to all services provided by UGI. HHS explains: “Coverage
14 extends to a recipient’s entire program or activity, i.e., to all parts of a recipient’s operations.
15 This is true even if only one part of the recipient receives the federal assistance.”¹²

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*; U.S. Dep’t of Justice, Title VI Legal Manual, at § VI, <https://www.justice.gov/ert/title-vi-legal-manual#VI> (defining and explaining the definition of a recipient under Title VI.)

1 **Q: Is UGI subject to Title VI when it delegates work to contractors or subcontractors?**

2 A: Yes. Recipients cannot evade Title VI's requirements by delegating work to contractors
3 or subcontractors.¹³ A recipient remains responsible for compliance, even if it hires
4 subcontractors.

5 **Q: Has UGI conducted any needs assessments of its LEP population?**

6 A: Yes. UGI reports having conducted a language needs assessment based on the number of
7 callers who have affirmatively requested – and therefore accessed – its telephone language
8 assistance service. In 2015, UGI fielded 30,542 calls in which language assistance was
9 requested. This amounts to 1.7% of the 1,811,570 total calls fielded in the same period of time.¹⁴

10 **Q: Is this an adequate assessment of the need for language services?**

11 A: No. UGI should base its language access needs on data from the geographic area it
12 serves. Basing language needs only on affirmative requests for interpretation services obscures
13 the real need for services by assuming that LEP persons know about and will ask for
14 interpretation and/or translation services. Many LEP individuals are not aware that they can ask
15 for interpretation and may attempt to muddle through the process without requesting
16 interpretation – or may rely on family or friends to go to call for them. Reliance on family or
17 friends for translation can cause for important aspects of the terms of service to be missed or
18 obscured, and raises significant privacy and confidentiality concerns.

¹³ 45 C.F.R. § 80.3(b)(1)

¹⁴ Appendix B (Response of UGI to CAUSE-PA III-8 and attachment).

1 I recommend that UGI be required to conduct an appropriate assessment of language
2 translation and interpretation needs based on the geographic areas they serve to ensure that the
3 requirements I outlined above regarding document translation are fulfilled.

4 **Q: Have you reviewed and can you summarize UGI's internal language access policies?**

5 A: Yes. UGI has two internal policies. The first, entitled "Policy for Spanish Speaking
6 Customers" applies only in a gas emergency, and provides: "CIC will provide Spanish speaking
7 reps to handle emergency calls only."¹⁵ It then explains how to identify whether the customer is
8 "calling to report a gas odor."¹⁶ On the back of the policy is a chart with various Spanish phrases
9 to help the call center representative identify whether the caller has a gas emergency. UGI has
10 nine (9) bilingual employees, seven (7) at its Reading call center, two (2) at its Wilkes-Barre call
11 center, and zero (0) at its EGS (third party) call center,¹⁷ though it is unclear whether any of
12 these employees has received interpretation training – a critical component to the provision of
13 adequate interpreter services.

14 UGI's second language access procedure, titled "Certified Languages," explains how to
15 access its telephonic language interpretation services, which are "designed to assist when there is
16 a need to use this service in order to determine what the customer is requesting."¹⁸ In 2015, the
17 service was used for 30,542 of its 1,811,570 calls – or 1.7%.¹⁹

¹⁵ Appendix B (Response of UGI to CAUSE-PA II-5 and attachments).

¹⁶ Appendix B (Response of UGI to CAUSE-PA II-5 and attachments).

¹⁷ Appendix B (Response of UGI to CAUSE-PA II-1).

¹⁸ Appendix B (Response of UGI to CAUSE-PA II-5 and attachment II-5-1)

¹⁹ Appendix B (Response of UGI to III-8 and attachment).

1 UGI has also translated several documents into Spanish: UGI's new customer booklet; a
2 webpage titled "Understanding Your Natural Gas Bill"; CAP program rules; CAP enrollment
3 application; CAP 15-day past due notice; and CAP re-certification notice.

4 **Q: What are your observations after reviewing UGI's language access policies?**

5 A: UGI's policies appear to comply with the basic requirements for Spanish language
6 translation contained in the Public Utility Code because its termination notice contains contact
7 information in Spanish.²⁰ UGI also evidences good faith efforts in attempting to address
8 language needs by retaining translation services that are accessible 24 hours a day and by making
9 critical documents for general service and its CAP program available in Spanish.²¹

10 That said, there are two critical issues with UGI's language access procedures which
11 require revision to meet the minimum language access requirements in Title VI. First, it is
12 unclear how LEP individuals are identified for translation services. In reviewing UGI's policy
13 and responses to interrogatories, it appears as though there is no affirmative notice that
14 interpretation services are available to callers. In turn, the policies seem to suggest that a caller
15 must affirmatively request interpretation services and/or the call representative must be unable to
16 understand the caller's objective before the interpretation service is used. But whether a caller
17 understands a call center employee is often not readily apparent, and – as I noted above – many
18 may not be aware of the service, or may not know how to request assistance. UGI should revise
19 its policy to ask callers – either directly or through the use of a call-in prompt - whether they
20 would like an interpreter at the start of the call to ensure that all LEP individuals are provided

²⁰ Appendix B (Response of UGI to CAUSE-PA III-8 and attachments)

²¹ Appendix B (Response of UGI to CAUSE-PA II-5 and CAUSE-PA III-8 and attachments).

1 with meaningful access to interpretation services. At a minimum, the information about the
2 availability of an interpreter should be in Spanish, the dominate language spoken by LEP
3 individuals. However, if UGI conducts a more appropriate assessment of language needs in the
4 geographic region, and finds that other languages are also prominent, those languages should
5 also be included in the information provided to callers about the availability of interpreter
6 services.

7 In addition to lacking notice of the availability of interpretation services, the contract
8 agencies that administer UGI's Universal Service programs are not able to access UGI's
9 interpretation services, and there appears to be no oversight by UGI to ensure that its contractors
10 are otherwise providing an interpreter for universal service applicants in need of such services.
11 UGI explained in response to interrogatories that it does not provide its universal service
12 contractors access to its telephonic language interpretation service.²² UGI has agency contracts
13 for administration of LIURP, Operation SHARE, and CAP. ****BEGIN CONFIDENTIAL****

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22 *****END CONFIDENTIAL*****

²² Appendix B (Response of UGI to CAUSE-PA III-9).

²³ Appendix B (CONFIDENTIAL Response of UGI to CAUSE-PA II-3 and attachment II-3-1).

²⁴ Appendix B (CONFIDENTIAL Response of UGI to CAUSE-PA II-3 and attachments II-3-2, -3).

1 Community based organizations (CBOs) are responsible for processing all universal
2 service program enrollments, and are critical to utility affordability for a large segment of the
3 LEP population. To ensure that these agencies are able to appropriately serve LEP applicants
4 and customers in accord with Title VI, UGI should be required to monitor its administering
5 agencies' access to its telephonic language interpretation services or should otherwise ensure that
6 each of its contracted agencies have access to similar language interpretation services. Further,
7 enrollment documents for other universal service programs, in addition to CAP, should be
8 translated into Spanish and should be available to administering agencies.

9 **Q: Are there other policies, practices, or procedures that inhibit immigrant populations**
10 **from accessing natural gas service?**

11 A: Yes. As I explained above, LEP individuals are more likely to be low income. As such,
12 the extensive issues raised in Mr. Mitchell Miller's testimony with regard to utility service
13 affordability and access for low income individuals disproportionately impacts LEP and
14 immigrant households.

15 In addition to the issues Mr. Miller raised, UGI requires applicants for service to produce
16 a Social Security Number (SSN) or state issued identification.²⁵ But there are many immigrants
17 – both LEP and non LEP - who do not have either document, and thus may be foreclosed from
18 accessing UGI's natural gas service.

19 **Q. Why is UGI's SSN requirement problematic for LEP and immigrant households?**

20 A. Many immigrants do not have a SSN, and are not eligible to get one. SSNs are used to report an
21 individual's wages to the government and to determine a person's eligibility for Social Security benefits.

²⁵ Appendix B (Response of UGI to CAUSE-PA II-8 and attachment).

1 Many foreign-born individuals are not eligible for a SSN because they do not have authorization from the
2 Department of Homeland Security to work in the United States. One example would be the spouse of an
3 F-1 (student) visa holder. Her visa type is F-2. Although she is authorized to be present in the US, she is
4 not authorized to work in the United States and would not be able to apply for a SSN.

5 Many other immigrants may have pending applications for status, and may be unable to produce
6 the requisite documents for several months or years while their applications are processed. For example,
7 immigrant domestic violence, sexual assault, and trafficking victims and their family members are able to
8 establish legal status and obtain work authorization by filing for a Violence Against Women Act
9 (VAWA) self-petition, U visa, or T Visa. But these application processes take time, sometimes many
10 years, and do not immediately or necessarily lead to the issuance of a SSN. As of its most recent
11 statement of processing time, the United States Citizenship & Immigration Services' Vermont Processing
12 Center - the office of the Department of Homeland Security that processes immigration applications, is
13 currently processing VAWA self-petitions (Form I-360) that were initially filed in August 2015 and U
14 visa applications (Form I-918) that were initially filed in May 2014.²⁶ All applications filed after these
15 dates are pending, or "waiting in line" for an adjudicator to make a decision on the application. While
16 *applications are pending, this vulnerable class of foreign-born individuals do not have work authorization*
17 *or legal status and, without the ability to access basic and essential services, may be forced to choose*
18 *between returning to an abuser or trafficker. Requiring applicants for service to provide a SSN would bar*
19 *this extremely vulnerable population from accessing a critical service at a time when they are most in*
20 *need of assistance.*

²⁶ USCIS Processing Time Information for the VT Service Center,
<https://egov.uscis.gov/cris/processingTimesDisplay.do?jsessionid=abco-YKF5vNyE6EITL2py>.

1 **Q: Does UGI's acceptance of state-issued identification serve as a reasonable substitute**
2 **for a SSN?**

3 A: No. To obtain a Pennsylvania state identification card, individuals must submit a U.S.
4 birth certificate and/or a valid US passport in addition to proof of residence in the
5 Commonwealth.²⁷ Applicants must also pay a \$28.50 fee for an identification card.

6 Many immigrants may have pending immigration status, as I explained above, and cannot
7 produce the required documentation to obtain a state-issued identification card. Many others
8 may have entered the United States without inspection, and therefore cannot obtain a state issued
9 identification. The fee for a state identification card – which is nearly \$30.00 – can also be
10 prohibitive, and takes away dollars which the household may need to pay for other necessities
11 (including their utility service).

12 Regardless of immigration status, all residents of Pennsylvania should be able to access
13 safe and stable utility services. Universal access to service is, indeed, a matter of public health,
14 welfare, and safety for both the individual and the surrounding community.

15 **Q: Do you have any recommendations for alternative documentation?**

16 A: UGI should accept additional alternative identification from applicants, including foreign
17 documents and passports, to establish a UGI account.

18 **Q: Does this conclude your testimony?**

19 A: Yes.

20

²⁷ Pa. DMV, Identification Cards in Pennsylvania, <http://www.dmv.org/pa-pennsylvania/id-cards.php>.

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EXPERIENCE

COMMUNITY JUSTICE PROJECT, Harrisburg, PA

Staff Attorney, July 2014-present

Represent low-income clients in a wide range of poverty law impact litigation, including employment, housing, consumer, and civil rights matters. Litigation includes class actions, group cases, administrative complaints, and individual cases. Conduct state and national advocate trainings on topics including language access and employment law. Co-oversee two offices focused on Hispanic outreach.

WASHINGTON LAWYERS' COMMITTEE FOR CIVIL RIGHTS & URBAN AFFAIRS, Washington, DC

Skadden Fellow, September 2012-July 2014

Established new initiative to expand representation to foreclosure rescue scam victims in Washington, DC, Maryland, and Virginia. Litigated foreclosure rescue scam and fair housing matters in federal and state court and before administrative tribunals. Conducted investigations. Provided advice and limited assistance to homeowners facing foreclosure and scam victims. Co-led foreclosure law, organizing, and policy initiative in Prince George's County, Maryland. Delivered presentations on foreclosure rescue scams to service providers and homeowners. Supervised interns.

U.S. COURT OF APPEALS FOR THE THIRD CIRCUIT, HON. THOMAS I. VANASKIE, Scranton, PA

Judicial Law Clerk, September 2011-August 2012

Performed legal research and writing regarding cases before the U.S. Court of Appeals for the Third Circuit. Supervised five interns.

HARVARD LEGAL AID BUREAU, HARVARD LAW SCHOOL, Cambridge, MA

Foreclosure Clinic Co-Director, 2010-2011; Student Attorney, 2009-2011

Represented indigent clients as lead counsel in housing, unemployment benefits, and Social Security benefits cases. Conducted jury trial. Interviewed clients and witnesses. Wrote and submitted evidence, motions, briefs, and memoranda to courts and to administrative tribunals. Presented arguments at court and at administrative hearings. Provided advice and limited assistance to *pro se* litigants.

PROJECT NO ONE LEAVES, HARVARD LAW SCHOOL, Cambridge MA

President, 2010-2011; Harvard Law School Coordinator, 2009-2010

Provided legal advice and assistance to tenants and former homeowners living in foreclosure properties. Conducted outreach. Managed Boston-wide organization consisting of six chapters. Facilitated expansion to additional cities throughout the United States. Organized two-day national conference for seventy-five legal services attorneys and community organizers from fifteen states.

TENANT ADVOCACY PROJECT, HARVARD LAW SCHOOL,
Cambridge, MA

Board Member, 2009-2011; Advocate, 2008-2009

Represented public housing tenants before Boston Housing Authority and other grievance hearings. Performed client interviews. Conducted case research. Trained new members.

DEPARTMENT OF JUSTICE: CIVIL RIGHTS DIVISION, Washington,
DC

Intern, Summers 2009, 2010

Researched and wrote internal memoranda and reports on issues in employment civil rights and Uniformed Services Employment and Reemployment Rights Act ("USERRA") enforcement cases. Drafted brief and memorandum in USERRA enforcement suit.

KLEIN HORNIG LLP, Boston, MA

Summer Law Clerk, Summer 2010

Researched and wrote memoranda relating to affordable housing transactions for non-profit developers, small for-profit developers, and tenants' associations. Wrote memoranda on fair housing issues. Drafted documents for the purchase, acquisition, and rehabilitation of affordable housing.

PROFESSOR ELIZABETH WARREN, HARVARD LAW SCHOOL,
Cambridge, MA

Research Assistant, Summer 2008

Researched consumer credit reporting for Prof. Elizabeth Warren.

CORNELL HILLEL, Ithaca, NY

Development Associate, 2007-2008; Intern, 2005-2007

Applied for grants. Researched prospective and current donors. Produced development reports for board of trustees and foundations. Managed fundraising data.

CORNELL FARMWORKER PROGRAM, Ithaca, NY

Intern, Summers 2006, 2007

Taught ESL to over 30 farmworkers. Educated farmworkers about their rights. Researched farmworker social integration and increased immigration enforcement. Researched immigrant access to driver's licenses in New York.

PRESENTATIONS

Pennsylvania Legal Aid Network Special Regional Training, *Enforcement: Wage Claims*, January 2016

National Housing Law Project Housing Justice Network Conference, *Enforcing Language Access Rights in Housing*, December 2015

National Legal Aid & Defender Association Annual Conference, *Strengthening Civil Rights Language Access Remedies*, November 2015

Pennsylvania Legal Aid Network Conference, *Enforcing Equal Access to Vital Services on Behalf of LEP Clients*, October 2015

Raise the Wage, *Wage Theft Workshop*, February 2015

Capitol Area Foreclosure Network, *Foreclosure Rescue and Loan Modification Scams*, November 2012

EDUCATION

HARVARD LAW SCHOOL, J.D., *cum laude*, May 2011

Honors: Dean's Scholar in Art of Social Charge
Recognition for completing more than 2,000 hours of pro bono service

CORNELL UNIVERSITY, B.A., *summa cum laude* in Sociology, Jan. 2008

Honors: Phi Beta Kappa
Robert Wertheimer Award (best sociology thesis outside the field of social psychology)

Thesis: *Immigrant Farmworker Social Integration in Upstate New York*

CAUSE-PA Statement 2, Appendix B

Interrogatory Responses of UGI

Response of UGI to CAUSE-PA II-1..... Appendix B-2
CONFIDENTIAL Response of UGI to CAUSE-PA II-3..... Appendix B-3
Response of UGI to CAUSE-PA II-5..... Appendix B-4
Response of UGI to CAUSE-PA II-8..... Appendix B-5
Response of UGI to CAUSE-PA III-8..... Appendix B-6
Response of UGI to CAUSE-PA III-9..... Appendix B-8

Response of UGI to CAUSE-PA II-1

Question 1 (Prepared by Robert Stoyko)

Please list the name and location of each UGI call center, and indicate the following with respect to each:

- a. The number of call center employees and their job titles;
- b. The number of bilingual call center employees and the language spoken;
- c. The education level and/or certifications required for employment for each job title.

Response:

Please see Attachment CAUSE-PA-II-1 for the call center employees that handle UGI Gas calls.

Attachment File Name

Attachment Note

CAUSE-PA II-1.pdf

a., b.

Location	# of Contact Center Representatives	# of Senior Representatives	# of Supervisors	# of Contact Center Bilingual Employees
Reading	48	3	3	7
Wilkes- Barre	48	3	3	2
EGS (Third Party)	15	0	1	0

c. Education or Job Requirements:

Contact Center Representatives	High School Diploma, Strong Communication Skills, Computer and Phone Skills
Senior Representatives	High School Diploma, Strong Communication Skills, Computer and Phone Skills, Strong knowledge of Regulations and Procedures.
Supervisors	Bachelor's Degree or Equivalent Work Experience, Supervisory Experience and Basic ACD Call Center Management Knowledge

BEGIN CONFIDENTIAL INFORMATION

**CAUSE-PA Statement 2, Marielle Macher, Esq.
Appendix B**

END CONFIDENTIAL INFORMATION

Response of UGI to CAUSE-PA II-5

Question 5 (Prepared by Robert Stoyko)

Does UGI have a language access plan or procedure? Please provide a copy of any such plan or procedure, including any language needs assessments performed by the Company.

Response:

Please see Attachments CAUSE-PA-II-5-1 and CAUSE-PA-II-5-2.

Attachment File Name	Attachment Note
CAUSE-PA II-5-1.pdf	
CAUSE-PA II-5-2.pdf	

Response of UGI to CAUSE-PA II-8

Question 8 (Prepared by Robert Stoyko)

Please list every instance in which a Social Security Number is requested or required from a UGI applicant or customer – including any requirements for production of a Social Security Number in the course of enrollment in Universal Service programs. For each instance, please:

- a. Identify whether the SSN is requested or required.
- b. Explain the purpose of requesting or requiring the number.
- c. Indicate any exceptions and/or accepted alternative documentation.
- d. Provide the portions of UGI's call scripts which request or require the information.

Response:

- a. On a request for service, an applicant is screened for prior UGI service and their payment history. If they did not have service, or if they had poor payment history, we run an Experian TEC report which requires a SSN.
- b. We request the SSN to perform the credit check. When we do not have prior UGI service history, the SSN is used to verify identity as well as credit worthiness.
- c. If an applicant does not wish to provide their SSN, they are permitted to provide their address from their license or State ID.
- d. Please see Attachment CAUSE-PA II-8.

Attachment File Name	Attachment Note
CAUSE-PA II-8.pdf	

Residential Applications (Phase 1 of training)

Definitions:

- **Customer** – A natural person at least 18 years of age in whose name a residential service account is listed and who is primarily responsible for payment of bills rendered for the service or an adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested. A natural person remains a customer after discontinuance or termination until the final bill for service is past due. Any customer who needs service at another address does not have to go through the whole application process to get new service. Normally, they would not have to pay a security deposit. Exceptions to this are when they are applying for concurrent service or they have a current termination notice for their current account.
- **Applicant** – Any natural person at least 18 years of age not currently receiving service who applies for residential service provided by a public utility or any adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested.
- **Concurrent Service** – When a customer has more than one account active at the same time.
- **Foreign Load** – Refers to the registration on a customer's meter that is not used directly and solely by the customer, of which the customer has no prior knowledge, and for which the customer receives no compensation or financial consideration. Foreign loads accounts **must** be in the name of the property owner. A tenant cannot be responsible for this service.
- **Landlord/Tenant** – When the utility service is in the landlord's name but a tenant or tenants are living at the property and benefiting from the service.
- **Ratepayer/Occupant** – An individual or organization that is not the property owner and does not have any connections with the property but would be putting the utility service in their name for someone else. An example of this would be a company or organization putting service in their name for an employee or a parent putting service in their name for a child that is a college student.

Scope:

In accordance with PUC regulations, all residential applicants who do not meet our credit standards must be notified in writing of the reason for the denial of service. Requesting a security deposit implies a denial of service even when we are billing it on the first bill. This procedure is designed to show the CCR proper handling for each scenario when a customer or an applicant is applying for service. The procedure will explain what information the CCR is required to ask a customer/applicant when applying for service, when to approve or deny service, and when the call may need to be transferred to the credit queue to complete the application for service.

If a customer or an applicant is calling because he/she was shut off for non-payment and wants service reconnected, the call will need to be transferred to the credit queue at extension 7809.

Procedure:

Before taking an application for service, always review MEMC and ACNX for recent activity. If the Gas/Electric is on, check KAHR to see if there is a current shut-off notice.

If the account has a status of **Inactive, Removed, or is a 26 account**:

- **UGI Gas** - Please follow your Inactive, Removed, 26 Accounts procedure.
- **PNG Gas** – You must rely on MEMC & work order history (ACNX & JADX) to determine if the service has been cut. Look for any orders that start with the letter “G” and documentation stating whether or not the service was cut. If the service was cut, do not take an application. Transfer the caller to the Internal Sales Group (ISG) at Extension 7829. If there are no work orders or documentation stating service was cut, it is o.k. to take an application for service.
- **Electric** – If the status is removed, the caller needs to be transferred to New Installs at Extension 7822. Otherwise, it is o.k. to take an application for service.

Important information related to residential applications:

- Always verify you are speaking directly to the person responsible for the service. If somebody other than the responsible person calls, take as much information as possible and issue a turn-on hold. The order cannot be released until the person responsible calls to authorize the service in his/her name.
- It is o.k. to release the work order for a legal power of attorney as long as UGI is provided proof.
- Calls from an interpreter will be accepted provided the customer/applicant is present.
- Always scan UGI CIS by social security number and name line 1 first. If the applicant did not have previous service with UGI, run an Experian connect check.
- An Experian connect check must be run again if the last connect check was done over 30 days ago for the same applicant.
- When a person is being transferred to the credit queue to complete an application, document the account before transferring to credit. The documentation must have all application information including Experian results and pin number (if there is a pin number).
- When issuing a turn-on hold and transferring the applicant to the credit queue, do not quote the deposit and do not put the deposit amount on the DATA screen of the work order. The credit CCR will do this.
- When releasing a turn on hold, make sure all other turn on holds at the same address are canceled.
- If a customer/applicant asks to have a security deposit split, we must do so. The deposit would be split as: 50% - 25% - 25%.
- Do not ask for a deposit if it is less than \$50.00. However, make sure the average bill is not low simply because the property has been vacant. If the usage does not appear normal, consult a Senior CCR or Supervisor.
- The default deposit amount when no other usage is available is \$180 for Residential heating accounts.

- If you see a foreign load indicator (F/L) on the bill screen, you cannot put service in a tenant's name. The service must remain in the property owner's name.
- We will allow a parent to put service in his/her name for a child that is a college student. We will also allow a company or organization to put service in their name for an employee. When doing this, the account must be coded "Ratepayer Occupant" (R/O).
- Service can only be put in the name of a person living at the property, on the mortgage, deed, or lease. We will not allow anybody else to take over service unless it's a ratepayer occupant (R/O) situation as described above.

The outline below will be used as a guide for the steps to be followed when taking an application for service:

- Information requested to open a new account.
- Customer transferring service.
- Applicant applying for service.

Information requested to open a new account

1. Address where service is being requested. Verify spelling, apartment number if applicable. If you cannot determine what apartment number the applicant/customer is responsible for, ask for the name of the last person living there or a meter number.
2. Full name of applicant/customer (including middle initial) Verify spelling.
3. Social Security number. If customer declines, run connect check with address on state identification.
4. If applicant, ask "have you ever had service with UGI"? If the answer is yes, ask where?
5. If service needs to be turned on, get the requested turn on date. If service is on, get the responsible date.
6. *Owner or Renter?*
 - **Owner** - Is there anybody else on the mortgage or deed? If so, who? Is this an investment property, rental?
 - **Renter** – Do you have a lease? If so, how long is the lease? Is anybody else on the lease? Who is the landlord? What is the landlord's address and phone number?

If anybody else is on the mortgage, deed, or lease, explain to the caller that UGI will be adding the other person on the mortgage, deed, or lease to the second name line. If you are told not to add them, do not add them, but document the name(s). Make the caller aware that you will not add them to the account, but they are still just as responsible for the gas/electric service as the person on the name 1 line.

7. Number of people, including children, residing at the property. (Use the income guidelines chart to determine if the household income is below poverty level). **A low income guidelines chart is given to the CCR every year. Example, page 6. If the customer is low income, the mail screen will display Low Income along with an expiration date which is one year from the date the account automates. Example, page 7.**
8. Mailing address. If the mailing address is different from the service address, the CCR must add sales tax to the DATA screen and send a Residential Tax Exemption letter (TAXE) off the letter add screen, LETA.

9. Quote tariff charge. **Example, page 8 & 9.**

10. Access:

- **Gas** - If the gas is off, get access information. Water & electric must be on to turn on the gas. If the gas is on, check to see if there is an ERT device, if there is an ERT or the meter is outside, the customer will not have to be there. If there is not an ERT and the meter is inside, we will need access information.
- **Electric** – Most of the time, we do not need access to turn on Electric. Most electric meters are outside. If the meter is inside, UGI will need access. Check the meter size code on the METI screen to determine crew headquarters. Most residential crew headquarter is 6725KO which is the default crew headquarters. **This information can be found in the DOJM manual and on Launchpad.**

Customer transferring service

1. Check the customer's current account to check credit status.
2. Take information requested to open a new account.
3. If the customer does not have a shut off notice and does not have a delinquent balance at the current address, release the order.
 - If the customer has an active shut off notice, issue a turn on hold and transfer the customer to the credit queue, extension 7809.
 - If the customer was shut off for non-payment and now wants service at a new address, issue a turn on hold at the new address and transfer the customer to the credit queue, extension 7809.
 - If the customer is delinquent, but does not have a shut off notice and is requesting service be transferred to a new address, release the work order. You must also inform the customer the delinquent balance will be transferred to the new account. Send a MEMO to ZMCA1 to transfer the balance to the new address/account number.
 - Any customer requesting concurrent service who is not already an established CR-1 customer must pay a security deposit.

Applicant applying for service:

If the applicant is applying for service at an address that was shut off for non-payment (SONP) within the last 6 months, take application, do a turn on hold and transfer the call to the credit queue, extension 7809.

1. Take information requested to open a new account.
2. Scan social security number and name line 1 in the CIS.
 - a. If the applicant had a previous account with UGI and was CR-1 with no outstanding balance, release work order, no deposit.
 - b. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance and no late penalty charges, release work order, no deposit.

- c. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance, but had late fees, run an Experian connect check.
 - d. If the applicant had a previous account with UGI and was CR-3 with no outstanding balance, run an Experian connect check.
 - e. If the applicant had a previous account with UGI and was CR-3 with an outstanding balance, do a turn on hold and transfer the applicant to the credit queue, extension 7809. Credit will quote conditions for service and send a denial/user letter.
3. If the applicant did not have a previous account with UGI, run an Experian connect check.
- a. If the applicant passes the Experian connect check, release the order.
 - b. If the applicant fails the Experian connect check for deposit only:
 - i. Gas/Electric on – release the order and bill the deposit. Send USER letter.
 - ii. Gas/Electric off – do a turn on hold and deny service for deposit only. Make sure to give the applicant the deposit identification number and payment options for the security deposit payment. Send DENL letter.
4. If identification is an issue, deny for 2 forms of valid Identification and a security deposit. Identification is covered in the Experian section of the manual.

Response of UGI to CAUSE-PA III-8

CAUSE-PA-III-8 (Prepared by Robert Stoyko)
Reference 52 Pa. Code 56.91(b)(17):

- a. How does UGI ensure compliance with this provision of the code?
- b. What languages within UGI's service territory meet the 5% threshold?
- c. Has UGI performed any internal assessments or studies or contracted for third party assessments or studies to determine the languages spoken within UGI's service territory and the rates with which those languages are spoken? If yes, please provide a copy of the needs assessment, along with any workpapers, studies, or other documents used to assess language needs.
- d. What UGI documents have been translated into other languages? Please identify the name of the document, the purpose of the document, and the languages in which the document was translated. Also append a copy of each document.
- e. Are universal service documents available in other languages? Please identify both the documents and the languages in which the documents were translated.

Response:

- a. The Company supplies contact information in Spanish on the written notice for termination. The Company reviews census data for the UGI Gas territories at MLA Language Map Data Center, https://apps.mla.org/map_data.
 - b. None. The Company tracks the calls interpreted by language. 99% of all translated calls are for Spanish-speaking customers.
 - c. For Calendar Year 2015, an internal assessment on the Company's translation service use concluded that 1.7% of the Company's callers request a translator. Please see response to CAUSE-PA II-6-1. The company handled 30,542 translated calls during this period. Total calls for that same period were 1,811,570. Please see Census Data Attachments CAUSE-PA III-8-c-1 through CAUSE-PA III-8-c-6.
 - d. Please see Attachment CAUSE-PA III-8-d-1. This is a copy of the Company's New Customer Booklet in Spanish.
Please see Attachment CAUSE-PA III-8-d-2. This page on the website provides a Spanish translation. That is the "Understanding Your Natural Gas Bill" page. Link is as following:
<https://www.ugi.com/customer-services/billing-and-payment/understanding-your-natural-gas-bill>.
 - e. Please see Attachment CAUSE-PA III-8-e-1. The attached letter is a Customer Assistance Program (CAP) 15 day past due notice translated in Spanish.
Please see Attachment CAUSE-PA III-8-e-2. The attached document is the CAP Enrollment Application translated in Spanish.
Please see Attachment CAUSE-PA III-8-e-3. The attached document is the CAP Re-certification translated in Spanish.
Please see Attachment CAUSE-PA III-8-e-4. The attached document is the CAP Program Rules translated in Spanish.
- In addition to the attached, upon request, the Company will mail a Department of Human Services LIHEAP application translated in Spanish.

<u>Attachment File Name</u>	<u>Attachment Note</u>
<u>CAUSE PA III-8-c-1.pdf</u>	
<u>CAUSE PA III-8-c-2.pdf</u>	
<u>CAUSE PA III-8-c-3.pdf</u>	
<u>CAUSE PA III-8-c-4.pdf</u>	
<u>CAUSE PA III-8-c-5.pdf</u>	
<u>CAUSE PA III-8-c-6.pdf</u>	
<u>CAUSE-PA III-8-d-1.pdf</u>	
<u>CAUSE-PA III-8-d-2.pdf</u>	
<u>CAUSE-PA III-8-e-1.pdf</u>	
<u>CAUSE-PA III-8-e-2.pdf</u>	
<u>CAUSE-PA III-8-e-3.pdf</u>	
<u>CAUSE-PA III-8-e-4.pdf</u>	

Berks County, Pennsylvania

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

[Show more
languages
spoken in Berks
County](#)

Sort alphabetically

	Ages 5 +	%
English	320,035	83.82%
All languages other than English combined	61,799	16.18%
Spanish	44,723	11.71%
Other West Germanic languages	3,781	0.99%
German	2,017	0.53%
Italian	1,394	0.37%
French Creole	1,186	0.31%
Vietnamese	1,161	0.30%
French	948	0.25%
Polish	894	0.23%
Chinese	880	0.23%
Other Indo-European languages	810	0.21%
Other Indic languages	557	0.15%
Greek	477	0.12%
African languages	402	0.11%
Tagalog	383	0.10%
Hindi	294	0.08%
Arabic	292	0.08%
Gujarathi	233	0.06%
Russian	160	0.04%
Other Slavic languages	157	0.04%
Other Asian languages	147	0.04%
Korean	142	0.04%
Urdu	118	0.03%
Hungarian	99	0.03%
Persian	84	0.02%
Portuguese	76	0.02%
Hmong	72	0.02%
Other Pacific Island languages	71	0.02%
Mon-Khmer, Cambodian	70	0.02%
Serbo-Croatian	63	0.02%
Total:	381,834	

Dauphin County, Pennsylvania

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

[Show more languages
spoken in Dauphin
County](#)

Sort alphabetically

	Ages 5 +	%
English	222,845	89.74%
All languages other than English combined	25,466	10.26%
Spanish	11,478	4.62%
Vietnamese	2,080	0.84%
Other West Germanic languages	1,461	0.59%
Chinese	1,030	0.41%
German	925	0.37%
African languages	804	0.32%
Arabic	781	0.31%
French	749	0.30%
Other Indic languages	598	0.24%
Italian	547	0.22%
Tagalog	499	0.20%
Other Asian languages	461	0.19%
Gujarathi	372	0.15%
Serbo-Croatian	361	0.15%
Russian	350	0.14%
Hindi	344	0.14%
Korean	310	0.12%
Other Pacific Island languages	248	0.10%
Mon-Khmer, Cambodian	244	0.10%
Polish	234	0.09%
Other Indo-European languages	210	0.08%
French Creole	166	0.07%
Portuguese	165	0.07%
Greek	153	0.06%
Other Slavic languages	153	0.06%
Urdu	127	0.05%
Laotian	120	0.05%
Hebrew	103	0.04%
Japanese	102	0.04%
Total:	248,311	

Lancaster County, Pennsylvania

Source: American Community Survey
Aggregate Data, 5-Year Summary File, 2006-2010

[Show more languages
spoken in Lancaster
County](#)

Sort alphabetically

	Ages 5 +	%
English	401,766	84.37%
All languages other than English combined	74,412	15.63%
Spanish	29,956	6.29%
Other West Germanic languages	21,818	4.58%
German	7,667	1.61%
Vietnamese	2,278	0.48%
French	1,368	0.29%
Chinese	1,362	0.29%
Russian	1,105	0.23%
Italian	1,023	0.21%
Mon-Khmer, Cambodian	700	0.15%
Other Asian languages	572	0.12%
Greek	568	0.12%
Other Indic languages	547	0.11%
Other Slavic languages	495	0.10%
Korean	488	0.10%
Polish	461	0.10%
Hindi	447	0.09%
African languages	418	0.09%
French Creole	391	0.08%
Other Indo-European languages	376	0.08%
Serbo-Croatian	295	0.06%
Tagalog	274	0.06%
Arabic	245	0.05%
Hmong	244	0.05%
Gujarathi	239	0.05%
Laotian	199	0.04%
Other Pacific Island languages	183	0.04%
Portuguese	135	0.03%
Scandinavian languages	97	0.02%
Thai	96	0.02%
Total:	476,178	

Lehigh County, Pennsylvania

Source: American Community Survey
Aggregate Data, 5-Year Summary File, 2006-2010

[Show more
languages spoken
in Lehigh County](#)

Sort alphabetically

	Ages 5 +	%
English	256,700	79.61%
All languages other than English combined	65,763	20.39%
Spanish	42,997	13.33%
Arabic	3,853	1.19%
German	2,182	0.68%
Chinese	1,988	0.62%
Other West Germanic languages	1,875	0.58%
French	987	0.31%
Vietnamese	986	0.31%
Italian	962	0.30%
Gujarathi	942	0.29%
Hindi	876	0.27%
Other Indic languages	852	0.26%
Other Indo-European languages	791	0.25%
Other Slavic languages	711	0.22%
Other Asian languages	685	0.21%
Polish	662	0.21%
Greek	556	0.17%
Korean	527	0.16%
Hungarian	372	0.12%
African languages	360	0.11%
Tagalog	336	0.10%
Russian	292	0.09%
Urdu	279	0.09%
Portuguese	271	0.08%
Japanese	250	0.08%
French Creole	247	0.08%
Hebrew	221	0.07%
Persian	178	0.06%
Scandinavian languages	164	0.05%
Mon-Khmer, Cambodian	162	0.05%
Total:	322,463	

Northampton County, Pennsylvania

Source: American Community Survey

Aggregate Data, 5-Year Summary File, 2006-2010

[Show more
languages
spoken in
Northampton
County](#)

Sort alphabetically

	Ages 5 +	%
English	243,410	87.46%
All languages other than English combined	34,885	12.54%
Spanish	18,986	6.82%
Italian	1,611	0.58%
Chinese	1,325	0.48%
Portuguese	1,305	0.47%
German	1,303	0.47%
Arabic	997	0.36%
Other Indic languages	835	0.30%
Polish	773	0.28%
Greek	743	0.27%
Other Asian languages	714	0.26%
Hindi	590	0.21%
Other West Germanic languages	582	0.21%
Other Slavic languages	579	0.21%
French	557	0.20%
Gujarathi	497	0.18%
Vietnamese	452	0.16%
Tagalog	433	0.16%
Russian	379	0.14%
African languages	375	0.13%
Other Indo-European languages	310	0.11%
Hungarian	295	0.11%
Korean	229	0.08%
Japanese	190	0.07%
Persian	173	0.06%
Urdu	169	0.06%
French Creole	126	0.05%
Thai	93	0.03%
Serbo-Croatian	82	0.03%
Scandinavian languages	78	0.03%
Total:	278,295	

Cumberland County, Pennsylvania

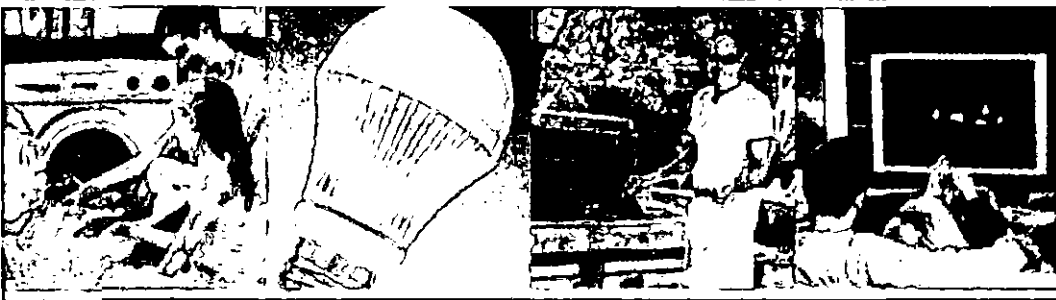
Source: American Community Survey
Aggregate Data, 5-Year Summary File, 2006-2010

Sort alphabetically

	Ages 5 +	%
English	202,275	92.41%
All languages other than English combined	16,621	7.59%
Spanish	4,110	1.88%
Other West Germanic languages	1,397	0.64%
German	1,246	0.57%
Gujarathi	957	0.44%
Serbo-Croatian	940	0.43%
Korean	830	0.38%
Arabic	775	0.35%
French	654	0.30%
Chinese	645	0.29%
Other Asian languages	642	0.29%
Italian	591	0.27%
Other Indic languages	546	0.25%
Greek	425	0.19%
Vietnamese	373	0.17%
Tagalog	298	0.14%
African languages	296	0.14%
Hindi	294	0.13%
Polish	263	0.12%
Urdu	232	0.11%
Japanese	185	0.08%
Other Indo-European languages	178	0.08%
Russian	175	0.08%
Other Slavic languages	132	0.06%
Portuguese	113	0.05%
Hungarian	79	0.04%
Scandinavian languages	48	0.02%
Other and unspecified languages	41	0.02%
Persian	37	0.02%
Laotian	36	0.02%
Total:	218,896	



Bienvenido a casa



Conozca a su nuevo proveedor de energía para el hogar.

Felicitaciones. Con el servicio confiable de UGI, usted ahora tiene la energía para hacer más.

Nos enorgullecemos de ofrecer un servicio confiable de energía. Ya sea que usted utilice a UGI para mantener su hogar cálido, el agua caliente, o las luces encendidas, nuestro personal capacitado está aquí para ayudar a responder a sus preguntas sobre energía. Nuestros empleados competentes están dispuestos a ofrecer servicio de emergencia experto cuando usted lo necesite, de día o de noche.

Nos damos cuenta de que nuestros clientes llevan vidas ocupadas y que pueden tener problemas de presupuesto. Para ayudar, UGI le proporciona opciones para ayudar a administrar su nueva cuenta y controlar los gastos. En esta guía se puede encontrar muy buena información o en nuestra página web en www.ugi.com.

UGI se compromete a darle una completa satisfacción. Valoramos tenerle como cliente y esperamos proveerle un servicio superior.

Gracias por elegir nuestro servicio de gas natural para sus necesidades de energía en el hogar.

To view this guide in English, visit www.ugi.com



Gas natural



Energía eléctrica

Esta guía provee información útil sobre el servicio de gas natural y el servicio eléctrico. Localice estos símbolos para ver qué información es relevante para su servicio.

¡Conectémonos!

Queremos conocer su opinión y compartir consejos excelentes que le ayudarán a ahorrar dinero, a conservar energía, a disfrutar recetas frescas, a ver videos útiles y a mantenerse al tanto de todas las formas en que UGI ayuda a la comunidad.

Por favor tómese un minuto para conectarse con UGI en estos populares sitios sociales:

facebook.com/ugiutilities

instagram.com/ugiutilities

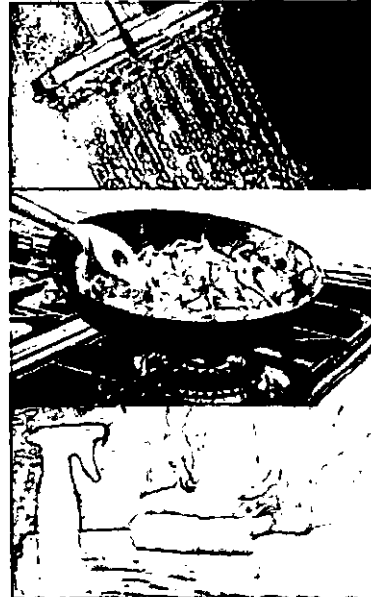
twitter.com/ugi_utilities

twitter.com/ugireads

youtube.com/ugiutilities

<http://blog.ugi.com>

<http://ugi.com/linkedin>



ATTACHMENT CAUSE-PA 11-8-d-1
R. R. STOYKO
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Su familia disfrutará de energía confiable y un servicio superior.





Su servicio de UGI

Ya sea que se esté mudando a un nuevo hogar, leyendo su medidor o programando cualquier servicio especial, hacemos lo posible para facilitarle las cosas. UGI trabajará con usted para que el servicio sea activado cuando usted llegue o para desconectarlo cuando usted se vaya. Para obtener más información, visite nuestra página web, www.ugi.com, o llame a UGI.

Activación del servicio para usuarios de energía eléctrica

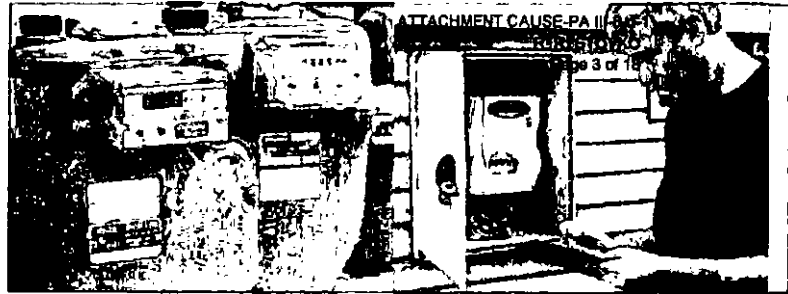
Para propiedades que hayan tenido servicio eléctrico de UGI, se deberá tomar una lectura del medidor para comenzar el servicio y a facturar. Si el gas está apagado y el medidor se encuentra dentro de su hogar, usted deberá estar disponible en la propiedad para permitir la entrada del personal. Si la energía eléctrica está encendida y su medidor cuenta con un dispositivo de lectura remota en el exterior (o si su medidor está localizado en el exterior), podremos llevar a cabo la lectura sin necesidad de hacer arreglos especiales para tener acceso.

Activación del servicio para usuarios de gas natural

Para propiedades que hayan tenido servicio de gas natural de UGI, se deberá tomar una lectura del medidor para comenzar el servicio y a facturar. Si el gas está apagado y el medidor se encuentra dentro de su hogar, usted deberá estar disponible en la propiedad para permitir la entrada del personal y la puesta en marcha de todos los aparatos que funcionan con gas natural. Si el gas está encendido y su medidor cuenta con un dispositivo de lectura remota en el exterior (o si su medidor está localizado en el exterior), podremos llevar a cabo la lectura sin necesidad de hacer arreglos especiales para tener acceso.

Corte del servicio

Por favor infórmenos con al menos siete días de anticipación sobre la fecha de suspensión del servicio para que podamos programar una lectura final del medidor y actualizar su información con la dirección para la facturación.



Su medidor de UGI



El personal de UGI debe tener acceso fácil a su medidor para llevar a cabo funciones de rutina tales como lecturas del medidor, verificaciones periódicas de seguridad, y mantenimiento rutinario, además de manejar tareas importantes de seguridad en caso de una emergencia. Para asegurar que su medidor funcione de forma apropiada, segura y confiable, por favor siga estos consejos importantes:

Si usted tiene un medidor exterior:

- ▶ Mantenga el medidor libre de cualquier vegetación que obstruya el acceso o la visibilidad. Los arbustos y las plantas deberán podarse regularmente.
- ▶ No construya cubiertas o cercas que bloqueen el acceso al medidor.
- ▶ Enseñe a los niños a no escalar o jugar cerca de un medidor.
- ▶ En el invierno, limpie cuidadosamente el hielo y la nieve que se acumulen en el medidor, así como en las rejillas de ventilación de cualquier otro aparato.
- ▶ Nunca use una máquina quitanieves o barredora alrededor de un medidor. Mueva cuidadosamente la nieve con una pala a mano.
- ▶ Si la nieve es muy profunda, despeje un camino seguro hacia el medidor.

Si usted tiene un medidor interior:

- ▶ Mantenga el área alrededor del medidor libre de cajas, muebles, estantes, etc.
- ▶ No construya paredes o paneles que obstruyan el acceso al medidor.
- ▶ Nunca cuelgue o apoye algo contra el medidor.
- ▶ Enseñe a los niños a no escalar o jugar cerca de un medidor.

Lecturas estimadas del medidor

El personal de UGI está programado para leer los medidores de cada cliente mensualmente. Sin embargo, existen ocasiones en que es necesario realizar una lectura estimada del medidor. Los clientes pueden recibir una factura estimada como resultado de condiciones climatológicas extremas, emergencias u otras circunstancias que impiden que UGI obtenga una lectura real del medidor. Las facturas estimadas se basan en factores como el historial de uso y la temperatura real durante el periodo de facturación. Si tiene alguna pregunta sobre una factura estimada, por favor llámenos.



¡Actúe de forma segura!

Nunca intente encender o apagar su servicio de gas natural o de energía eléctrica por sí solo. Solamente los técnicos profesionales y entrenados de UGI están autorizados para activar o desactivar su servicio.

Aprenda a usar su nuevo servicio de energía de forma segura.

Seguridad relacionada al gas natural

Aprenda a distinguir el olor del gas natural

El gas natural no tiene olor ni color en su forma natural. Para poder ser detectado, se le agrega un químico llamado *mercaptano*. Este químico tiene un olor similar al de los huevos podridos. Si usted detecta ese olor singular, es necesario actuar.

Qué hacer si huele gas:

Si está dentro de un edificio:

- ▶ SALGA del edificio inmediatamente. Llévase a todos con usted (incluyendo a las mascotas). De ser posible, deje la puerta abierta.
- ▶ VAYA a un lugar seguro en donde usted ya no pueda detectar el olor del gas.
- ▶ LLAME a la línea de emergencia de gas de UGI desde un lugar seguro. La línea de emergencia de gas está disponible 24 horas al día, 7 días a la semana.
- ▶ LLAME al 911 desde un lugar seguro si alguna vez escucha o ve una fuga de gas natural.

Si está fuera de un edificio:

- ▶ LLAME a la línea de emergencia de gas de UGI desde un lugar seguro 24 horas al día, 7 días a la semana si usted huele o detecta gas natural afuera o cerca de un medidor de gas.
- ▶ LLAME al 911 desde un lugar seguro fuera del edificio si escucha o ve una fuga de gas natural.



Llame al número de teléfono de UGI que se encuentra en la hoja adjunta llamada "Cómo contactar a UGI" para obtener un folleto GRATIS que incluye una muestra para rascar y oler el olor agregado al gas natural sin olor.

Lo que NO debe hacer si huele gas dentro o fuera de un edificio:

- ▶ NO vuelva a entrar al edificio para abrir puertas y ventanas.
- ▶ NO use teléfonos, computadoras, electrodomésticos, elevadores, lámparas, puertas automáticas de garaje ni aparatos eléctricos si hay un olor a gas presente.
- ▶ NO toque los enchufes, interruptores o timbres eléctricos.
- ▶ NO fume ni use encendedores, fósforos u otras llamas expuestas.
- ▶ NO opere vehículos ni equipos motorizados en donde pueda haber una fuga de gas presente.
- ▶ NO trate de volver a encender la llama de encendido (luz piloto).
- ▶ NO nos envíe correos electrónicos ni escriba notificaciones en nuestras redes sociales si usted huele gas natural o si sospecha que hay una fuga. POR FAVOR LLAME A UGI O AL 911.
- ▶ NO vuelva a entrar al hogar o al edificio hasta que haya sido inspeccionado minuciosamente por nuestro técnico de servicios.

No cobramos por responder e investigar un olor de gas natural.

Cómo reconocer una fuga en la tubería de gas

Como ya mencionamos, el gas natural no tiene color ni olor, así que se le agrega *mercaptano* para poder detectar las fugas fácilmente. Además del olor, otras indicaciones de una fuga en la tubería de gas pueden incluir lo siguiente:

- ▶ Sonidos de silbido
- ▶ Aire que sopla la tierra, la hierba o las hojas
- ▶ Aire burbujeante o que sopla en un estanque, riachuelo o río
- ▶ Un área con hierba o plantas muertas en donde deberían estar verdes
- ▶ Llamas que salen del suelo o fuego por encima del suelo

Seguridad relacionada al monóxido de carbono

Aunque al gas natural se le agrega un olor, la combustión incompleta de CUALQUIER combustible fósil puede producir un gas inodoro, insípido e incoloro llamado *monóxido de carbono* (CO, por sus siglas en inglés). Usted puede protegerse a sí mismo al conocer los siguientes datos:

- ▶ El monóxido de carbono puede entrar a los espacios en donde las personas están en su hogar como producto del mal funcionamiento de electrodomésticos o chimeneas bloqueadas.
- ▶ Todo equipo que funciona con combustibles inflamables debe ser instalado y recibir mantenimiento regular por un profesional con experiencia.
- ▶ Todo equipo que funciona con combustibles inflamables necesita una adecuada ventilación y flujo de aire para funcionar con seguridad. No instale equipo en espacios confinados. Al hacer remodelaciones, obtenga el asesoramiento de un profesional para que especifique el espacio requerido para los equipos que funcionan con combustibles inflamables.
- ▶ Las señales que indican que usted puede tener un problema de monóxido de carbono incluyen: vapor de agua condensado en las ventanas (la excepción de la humedad normal en baños y cocinas), dolores de cabeza, mareos, síntomas parecidos a los de la gripe y náuseas.
- ▶ Debe instalarse un detector de monóxido de carbono en cada piso de la vivienda, particularmente cerca de cada área de dormir.
- ▶ Si se activa la alerta del detector de monóxido de carbono o si usted sospecha de envenenamiento por monóxido de carbono, diríjase a un lugar con aire fresco y llame a UGI o al 911.



Proteja su hogar con detectores de monóxido de carbono.



Seguridad relacionada al servicio eléctrico

Las emergencias eléctricas pueden ocurrir en cualquier lugar y a cualquier hora. Siga estos consejos para aumentar su seguridad en cualquier situación.

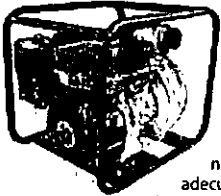
Cables caídos

Suponga que los cables están energizados y no los toque. Manténgase alejado de los cables caídos y advierta a los demás que se mantengan alejados. Llame a UGI inmediatamente. Si un cable está tocando su vehículo, permanezca adentro. Si su vehículo se incendia, es importante que salga del vehículo inmediatamente. Debido a que el metal conduce la electricidad, no toque el metal del vehículo y el suelo al mismo tiempo. Saltar lejos del vehículo es la forma correcta para salir de éste.



Incendios eléctricos en el interior

Desenchufe o corte el suministro eléctrico sin tocar el aparato. Use un extintor de fuego de Clase C, si hay uno disponible. Si no hay uno disponible, arroje bicarbonato de soda en el fuego, nunca use agua en un incendio eléctrico. Si es necesario, llame al departamento de bomberos.



Generadores portátiles

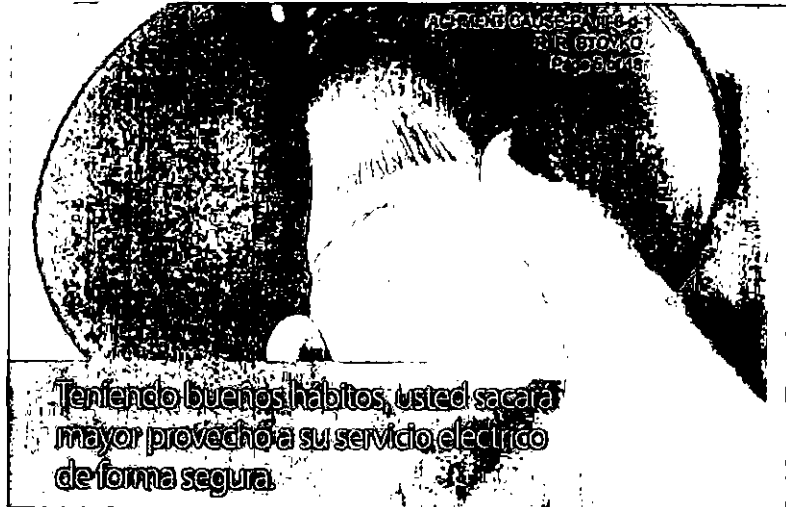
El uso inadecuado de los generadores portátiles puede dar lugar a incendios eléctricos o a la entrada de gas venenoso de monóxido de carbono en la casa. Nunca use un generador en el interior de la casa, ni en su garaje ni en el sótano, o en ningún espacio cerrado. Utilice siempre los cables de alimentación adecuados y siga las instrucciones del fabricante para que el generador funcione de forma segura. No sobrecargue el generador usando más equipos de lo que el generador especifica que puede soportar. Asegúrese de que su generador está conectado a tierra correctamente.

Bombillas

Asegúrese de apagar el interruptor de la luz antes de cambiar una bombilla. Para evitar incendios debido a sobrecalentamiento, utilice únicamente bombillas con la potencia eléctrica adecuada para las lámparas o luces de techo. Las luces fluorescentes compactas (CFL, por sus siglas en inglés) ahora son comunes en muchos hogares, habiendo sustituido a las bombillas incandescentes ineficientes. Visite la página web de la Agencia de Protección Ambiental para conocer formas seguras de deshacerse de las bombillas.

Cables eléctricos

Revise sus cables a menudo para buscar desgaste o daños, y reemplácelos si es necesario. Utilice el cable de extensión adecuado para el trabajo en cuestión (use cables de extensión de alta resistencia con herramientas eléctricas y use cables de extensión que sean resistentes a la humedad para trabajar al aire libre). Además, asegúrese de colocar todos los cables de forma segura y fuera del camino para que las personas no se tropiecen con ellos.



Teniendo buenos hábitos, usted sacará mayor provecho a su servicio eléctrico de forma segura.

Enchufes o tomacorrientes

Si usted tiene niños que viven o visitan su casa, asegúrese de haber instalado protectores o cubiertas de seguridad para enchufes (disponibles en la mayoría de las ferreterías y centros de proyectos del hogar). Además, nunca sobrecargue los enchufes. Tener demasiados cables conectados a un circuito crea un peligro eléctrico.

Plantando y podando árboles.

Es necesario usar procedimientos adecuados para sembrar y podar árboles para ayudar a prevenir la interrupción del servicio eléctrico. Una interrupción del servicio puede ocurrir cuando las ramas entran en contacto con las líneas eléctricas. Los árboles deben mantenerse a una distancia segura de todos los cables eléctricos. Para garantizar su seguridad y proporcionar un servicio confiable, UGI mantiene un programa coordinado de manejo de la vegetación que promueve la adecuada selección y plantación de árboles, así como también la poda de árboles cerca de las líneas eléctricas. Se puede obtener un folleto gratuito titulado "Árboles para Calles y Céspedes" llamando a UGI.

Programa de iluminación para la seguridad y protección para clientes del servicio eléctrico de UGI

Por un cargo nominal mensual, los clientes de servicio eléctrico de UGI pueden recibir el servicio de iluminación exterior de UGI. Una iluminación exterior adecuada mejora la visibilidad, reduce los accidentes y disuade a los ladrones y vándalos. Una vez instaladas, las luces al aire libre se encienden de forma automática al atardecer y se apagan al amanecer. Para obtener más información, llame a UGI.



Seguridad relacionada al calentador de agua y a los electrodomésticos

Seguridad relacionada al calentador de agua

Asegurar la seguridad de su familia en el hogar es una prioridad para todos nosotros. Fijar una temperatura adecuada para el calentador de agua es una forma de asegurar la seguridad de la familia.

La temperatura de su calentador de agua debería ser disminuida de 150° F a 120° F por propósitos de seguridad y rendimiento.

La tabla que se encuentra a la derecha muestra el impacto que tienen los calentadores de agua ajustados de manera incorrecta.

Temperatura del agua	Tiempo de exposición para causar una quemadura grave
150°F (66°C)	2 segundos
140°F (60°C)	6 segundos
125°F (52°C)	2 minutos
120°F (49°C)	10 minutos

Fuente: Sistema de Salud de la Universidad de Michigan

Seguridad relacionada a los electrodomésticos

- ▶ Siga las instrucciones del fabricante con respecto al cuidado y el funcionamiento de los aparatos.
- ▶ Los equipos deben ser instalados, reparados y recibir mantenimiento por un profesional con experiencia.
- ▶ La llama de gas debe ser principalmente azul. Si es amarilla o anaranjada, apague el equipo y llame al servicio técnico (con la excepción de las chimeneas de gas).
- ▶ Siempre asegúrese de que no haya acumulación de gas cerca de los pilotos o quemadores antes de volver a encenderlos.
- ▶ Mantenga las salidas de sus aparatos de gas limpias y con la ventilación apropiada. Si usted instaló un quemador para la conversión al gas natural durante el último año, esté pendiente de la presencia de hollín y la acumulación residual del combustible anterior. La acumulación de residuos podría bloquear la salida y la base de la chimenea.
- ▶ Enseñe a los niños a que nunca prendan o enciendan los aparatos de gas.
- ▶ Mantenga la basura y otros materiales inflamables lejos de los electrodomésticos de gas natural.
- ▶ Si usted tiene un electrodoméstico de gas viejo, asegúrese de que sea examinado por un plomero calificado o un contratista de calefacción/ventilación/refrigeración o de reparación de electrodomésticos. No intente mover los electrodomésticos usted solo para verificar los conectores.

¡Actúe de forma segura!
Fije la temperatura del agua caliente a 120°F (49°C) tanto por motivos de seguridad como de rendimiento.

Seguridad relacionada a las tuberías

Los hábitos de seguridad van más allá de las paredes y los cimientos de su hogar. Siga estas pautas para evitar daños innecesarios a las tuberías que llevan el gas natural, las líneas eléctricas y otros servicios públicos mientras usted disfruta de su hogar y propiedad.

Seguridad relacionada a las tuberías que se encuentran sobre el nivel del suelo

Nunca se debe colgar prendas de vestir ni cualquier otro objeto de las tuberías que están sobre el nivel del suelo. El peso adicional de las prendas de vestir (especialmente la ropa mojada colgada al sol para secar) pueden debilitar o romper las uniones o conexiones de las tuberías, lo cual ocasionaría una fuga.

Seguridad relacionada a las tuberías que se encuentran bajo tierra

Llame al 811 tres días antes de empezar cualquier proyecto de excavación – es la ley. Ya sea que esté realizando proyectos mayores de excavación o proyectos menores de jardinería, protéjase de los peligros relacionados al daño de las tuberías que se encuentran bajo tierra. Es sencillo. Una llamada GRATIS hace que todas las líneas de los servicios públicos sean marcadas para ayudar a protegerlo de lesiones y daños costosos a la propiedad. Si usted planea excavar, o si ve a otra persona excavando en un área cerca de las líneas de servicios públicos, llame al 811.

¿Qué hay sobre las líneas de gas que se encuentran más allá del medidor?

No todas las tuberías de gas natural que se encuentran bajo tierra pertenecen y son administradas por UGI. Si hay tuberías

enterradas que se encuentran más allá del medidor de gas natural, éstas le pertenecen al dueño de la propiedad.

Al proveer el servicio de gas natural, UGI es responsable solamente del mantenimiento de las tuberías que llegan hasta el medidor de gas, incluyendo el medidor. Todas las tuberías de gas natural en la propiedad que van más allá del medidor deben ser mantenidas por el dueño de la propiedad.

Al excavar cerca de las tuberías de gas natural enterradas, localice siempre las tuberías antes de excavar y marque el área. Luego excave con las manos en el área cerca de las tuberías. Con el fin de garantizar la seguridad y la buena condición de las tuberías, inspecciónelas periódicamente para detectar fugas y corrosión.

Si usted necesita ayuda para localizar, inspeccionar o reparar tuberías, puede contactar a su plomero local o contratista de calefacción, o también puede llamar a UGI.



Determina lo que está bajo tierra.
Llama antes de excavar.



Piense en la seguridad

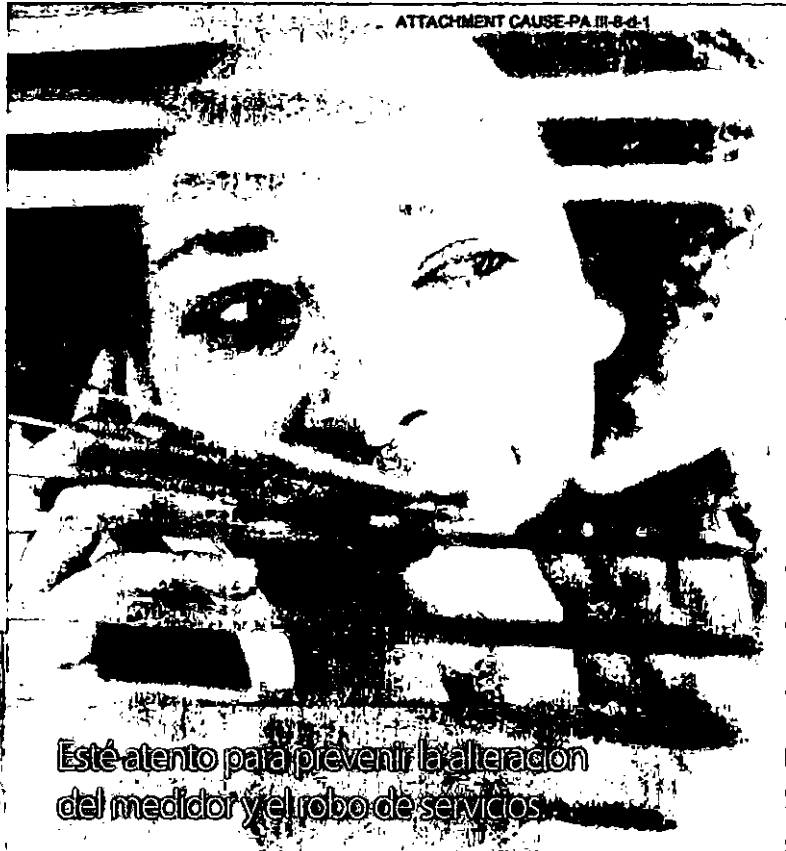
Su bienestar es importante para UGI. Trabajemos juntos para asegurar que usted y su familia puedan disfrutar de un servicio superior ofrecido por nuestro.

Pida una identificación

Los lectores de los medidores de UGI y nuestros representantes de servicio usan uniformes con los logotipos profesionales de la compañía y conducen vehículos claramente identificables. La mayoría de los servicios de UGI son realizados en base a un horario previamente establecido. Un representante de UGI fijará una cita con usted antes de visitar su propiedad. Las excepciones incluyen las lecturas mensuales de los medidores e inspecciones rutinarias de control de fugas y corrosión.

Cuando llegue el representante de UGI, usted debe solicitar que le muestre la identificación apropiada antes de dejarlo entrar. A todos los empleados de UGI se les exige que porten tarjetas de identificación y con gusto las muestran si se lo solicitan. Estas tarjetas muestran el logotipo de la compañía, la foto del empleado y su información básica.

Si usted tiene sospechas sobre la identificación o actividades de una persona, no le permita la entrada. En cambio, llame a UGI para verificar si esa persona tiene programado realizar un trabajo en su casa, negocio o vecindario.



Esté atento para prevenir la alteración del medidor y el robo de servicios.

Evite la alteración ilegal de medidores y líneas

Es peligroso alterar los medidores, los cables eléctricos y las líneas de gas natural. Alterar las líneas o los medidores pone a gente inocente bajo riesgo de sufrir lesiones o daños a la propiedad, además, es contra la ley.

Cualquier persona que altera ilegalmente nuestros medidores o que activa su propio servicio eléctrico o de gas le está robando a usted y a UGI, y esa persona podría ser multada o condenada a prisión.

Llámenos inmediatamente si usted se entera de alguna alteración de medidores o robo de servicio. UGI mantendrá su reporte confidencial. Sus esfuerzos podrían salvar vidas inocentes del peligro, además de ayudarnos a mantener las tarifas y cargos tan bajos como sea posible para todos nuestros clientes honestos.

Actúe de la forma segura!
A todos los empleados de UGI se les exige que porten tarjetas de identificación con su logotipo y con gusto las muestran si se lo solicitan.



Usted tiene el poder de elegir su proveedor de energía.

Se garantiza el servicio y confiabilidad

UGI quiere que usted sepa que tiene la opción de elegir a una tercera parte como proveedor de energía. Independientemente del proveedor que elija, UGI continuará entregando la energía para su hogar y mantendrá nuestros sistemas de distribución de gas y electricidad. Usted recibirá el mismo nivel de servicio y confiabilidad que usted ya disfruta de UGI.

UGI no puede recomendar proveedores, ni proporcionar información sobre sus precios. Vea su más reciente factura de UGI para obtener el precio actual de UGI para compararlo. Vea un ejemplo de una factura de UGI en la página 13. También puede verlo en línea en pricetocompare.ugi.com.

Consejos para comprar

Haga una lista de las preguntas que usted tiene para los proveedores de gas natural y de electricidad antes de contactarlos, y esté preparado para escribir las respuestas. Para obtener una verdadera comparación "de manzana a manzana", asegúrese de que el precio que los proveedores eléctricos le dan es en kWh (horas de kilovatios de electricidad) y que el precio que los proveedores de gas natural le dan es en CCF (pies cúbicos de gas natural).

Preguntas que usted puede hacer a los proveedores:

- ▶ ¿Cuál es su precio por kWh de electricidad o por CCF de gas natural? ¿Incluye este precio la transmisión y los costos de energía alternativos exigidos por el estado?
- ▶ ¿Es esta tasa constante o puede cambiar?
- ▶ ¿Tengo que firmar un contrato? ¿Cuál es la duración del acuerdo?
- ▶ ¿Existen sanciones por el cambio o cancelación?
- ▶ ¿Recibiré una factura o dos? ¿Tengo alguna opción?
- ▶ ¿Existen restricciones sobre la cantidad de electricidad que puedo utilizar o cuando la puedo usar?
- ▶ El Precio a comparar de UGI incluye todos los impuestos aplicables. ¿Incluye la tasa del proveedor los impuestos?
- ▶ ¿Hay otros cargos o costos?
- ▶ ¿Qué otros productos o servicios ofrecen?

Escogiendo otro proveedor

Los proveedores pueden ponerse en contacto con usted directamente, por correo o por teléfono. Otras fuentes de información incluyen la publicidad por televisión y radio, el Internet, o la Oficina de Defensa al Consumidor de Pennsylvania (OCA, por sus siglas en inglés). Revise todos los materiales que reciba. Haga una lista de las preguntas que tenga para los proveedores, y obtenga respuestas claras.

Para obtener una lista de proveedores autorizados de generación eléctrica y de gas natural, visite las siguientes páginas web:

- ▶ Los proveedores de generación eléctrica pueden obtenerse poniéndose en contacto con UGI, visitando www.ugi.com o la página web de la Comisión de Servicios Públicos de Pennsylvania en www.papowerswitch.com.
- ▶ Los proveedores de gas natural pueden obtenerse poniéndose en contacto con UGI, visitando www.ugi.com o la página web de la Comisión de Servicios Públicos de Pennsylvania en www.pagasswitch.com.

Si usted decide que otro proveedor de generación eléctrica o de gas natural es el adecuado para usted:

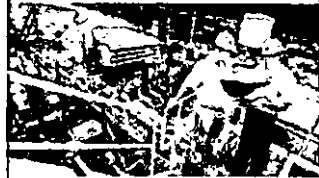
- ▶ Notifique al proveedor de su elección. El proveedor le enviará una declaración que establece los términos de su acuerdo. Usted puede cancelar su elección dentro de tres días hábiles después de haber recibido la declaración. Una penalidad puede aplicarse si no se queda con un proveedor por todo el periodo del acuerdo.
- ▶ El proveedor de su elección notificará a UGI.
- ▶ Usted recibirá una carta de UGI confirmando su elección. Por favor, asegúrese de que es el proveedor correcto.

IMPORTANTE: Si usted participa en el Programa de Asistencia al Cliente (CAP, por sus siglas en inglés) y desea elegir otro proveedor, por favor póngase en contacto con UGI para obtener ayuda.

Cómo la electricidad llega a usted

Su servicio eléctrico incluye tres partes distintas:

Generación



Transmisión



Distribución



En Pennsylvania, la "generación" de electricidad es un negocio competitivo. Usted puede buscar y comparar el costo del servicio de generación. Usted también puede comparar otras opciones, tales como dónde y cómo se genera la electricidad.



Saque provecho a sus opciones de pago.

Conozca todas sus opciones y recursos

Además de las opciones de pago único mencionadas aquí, usted puede encontrar convenientes programas, planes de pago y recursos de ayuda en las páginas 16-21. Si usted tiene alguna pregunta o si desea más información, por favor contáctenos.

Pago en línea

Para pagar su factura en línea, visite www.ugi.com/ebill. Al registrarse para el programa eBill, usted puede ver y pagar las facturas mensuales de forma conveniente en línea sin cargos. Si usted desea hacer un pago único en línea usando un cheque o tarjeta de crédito, se le cobrará una tarifa nominal de procesamiento. UGI no recibe ninguna parte de esta tarifa. También ofrecemos una página web compatible con aparatos móviles y una aplicación móvil para pagar su factura.

Pago por teléfono

Llame al (877) 503-2956 para pagar su factura por teléfono. Se cobrará una tarifa nominal. UGI no recibe ninguna parte de esta tarifa.

Pago por correo

Los clientes pueden enviar sus pagos por correo a la dirección que se encuentra en la hoja titulada "Cómo contactar a UGI". Siempre incluya su número de cuenta de UGI en su cheque.

Ubicación de las agencias de pago

Usted puede pagar su factura en una agencia de pago autorizada. Visite nuestra página web www.ugi.com o llámenos para obtener información sobre la ubicación de las agencias de pago. Los centros de atención personal para pagos son agentes independientes que pueden cobrar una tarifa por su servicio. UGI no recibe ninguna parte de esta tarifa.

Acuerdos de pago para facturas vencidas

Si usted tiene problemas para pagar sus facturas de UGI, llame a UGI inmediatamente a UGI.

Si usted tiene ingresos limitados y necesita ayuda, UGI cuenta con un número de programas de asistencia. Llame al (800)-UGI-WARM, (800) 844-9276 para obtener más información.

Estamos comprometidos a trabajar con los clientes que hacen un esfuerzo sincero para pagar. Por favor llámenos inmediatamente si alguna vez tiene un problema o una pregunta. Estamos aquí para ayudarle.



Extensión de la fecha de vencimiento para clientes con ingresos fijos

Si usted tiene un ingreso fijo, usted puede ser elegible para participar en el programa de Extensión de la fecha de vencimiento de UGI.

Este programa ofrece tiempo adicional para depositar sus cheques mensuales y así pagar a UGI a tiempo para evitar cargos por retraso.

Para aplicar, por favor llámenos para obtener una solicitud para el programa de Extensión de la fecha de vencimiento. Cuando la reciba, simplemente envíela de vuelta con una copia de su carta de asignación de beneficios de seguridad social u otro documento que establezca su condición de ingreso fijo. Esto nos ayudará a procesar su solicitud rápidamente.

Programa de notificación a terceras partes

Con este programa, UGI le ayuda a evitar problemas para pagar su cuenta enviando una copia de cualquier aviso de vencimiento o corte del servicio a una tercera parte que usted elija – algún amigo, pariente, encargado o incluso su agencia de servicios sociales preferida.

Cómo funciona el programa

Usted nos proporciona el nombre, la dirección y el número de teléfono de la persona u organización que usted desea que sea notificada cuando sea creada cualquier notificación futura de vencimiento o corte del servicio. De ser necesario, UGI enviará por correo una copia de la notificación o llamará a su persona designada.

Tanto usted como la tercera parte que usted eligió deben estar de acuerdo con este proceso de notificación y firmar un formulario que confirme el acuerdo. Usted puede escoger a cualquier persona en los Estados Unidos para ser su tercera parte.

IMPORTANTE: La tercera parte no es responsable de pagar ninguna de sus facturas. Nosotros simplemente le damos a la persona que usted designó la oportunidad de recordarle a usted que pague su factura y que mantenga su cuenta al día.

Si desea registrarse en el programa de Notificación a terceras partes, por favor llámenos. Todas las empresas de servicios públicos de Pennsylvania participan en el programa de Notificación a terceras partes.





Planes de pago

Hacemos que realizar el presupuesto sea fácil con planes de pago tales como Facturación por presupuesto y Deducción automática.

Plan de facturación por presupuesto (Budget Billing Plan, en inglés)

No más sorpresas. Sepa cuál es el total de su factura cada mes.

Si su consumo de electricidad o de gas varía mucho de mes a mes o varía según la temporada, el plan de Facturación por presupuesto puede ser una buena opción para usted. El plan de Facturación por presupuesto le permite distribuir equitativamente sus costos de UGI a lo largo del año. Registrarse es gratis.

Cómo funciona el plan de Facturación por presupuesto

UGI estimará su uso anual y distribuirá la cantidad de manera equitativa a través del período del plan de Facturación por presupuesto para calcular el monto mensual de su factura. Su pago mensual de Facturación por presupuesto puede ser

ajustado cada tres meses para mantener el pago de acuerdo a su uso de energía real.

UGI compara la cantidad de energía realmente utilizada con la cantidad que fue estimada y determina si es necesario hacer un ajuste a su pago mensual. El monto de su factura mensual también se puede ajustar incrementándolo o disminuyéndolo dependiendo de los cambios en las tasas de UGI.

Al final del 12vo mes, si hay una diferencia entre lo que usted ha pagado y el uso real, saldaremos su cuenta.

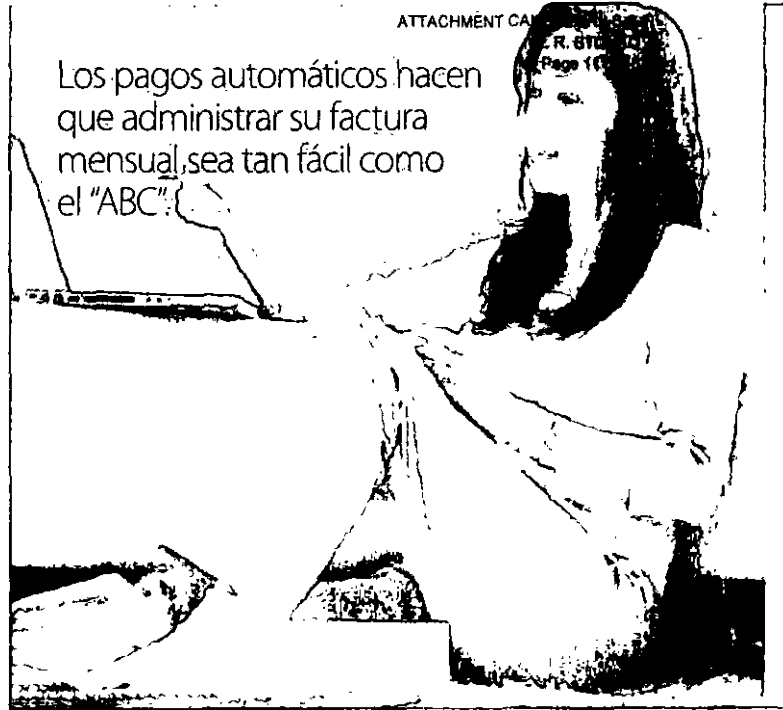
Nota: Su cuenta debe estar pagada hasta la fecha antes de poder inscribirse en el plan de Facturación por presupuesto. Para continuar participando en el plan, se requiere que los pagos se realicen cada mes en la fecha de vencimiento o antes.

¡Es fácil registrarse!

No hay ningún cargo para utilizar el plan de Facturación por presupuesto de UGI. Usted puede registrarse en cualquier mes del año. Para registrarse, por favor tenga su número de cliente de UGI a mano, y visite nuestra página web www.ugi.com o llámenos.

ATTACHMENT CA

Los pagos automáticos hacen que administrar su factura mensual sea tan fácil como el "ABC".



¡Este plan funciona de maravillas con nuestro plan de pago tan fácil como el ABC!

Una vez que usted esté registrado en el plan de facturación por presupuesto, usted puede añadir la conveniencia de los pagos automáticos con nuestro plan de pago llamado tan fácil como el "ABC". Vea la página 19 para obtener todos los detalles.

Plan de Deducción automática ("ABC")

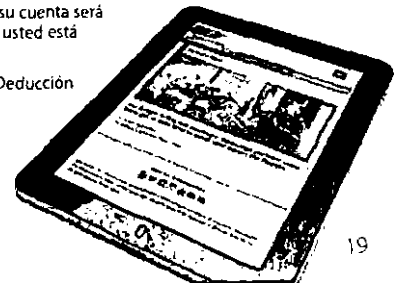
Ahorre tiempo y dinero con el plan de Deducción automática – Es tan fácil como el "ABC"

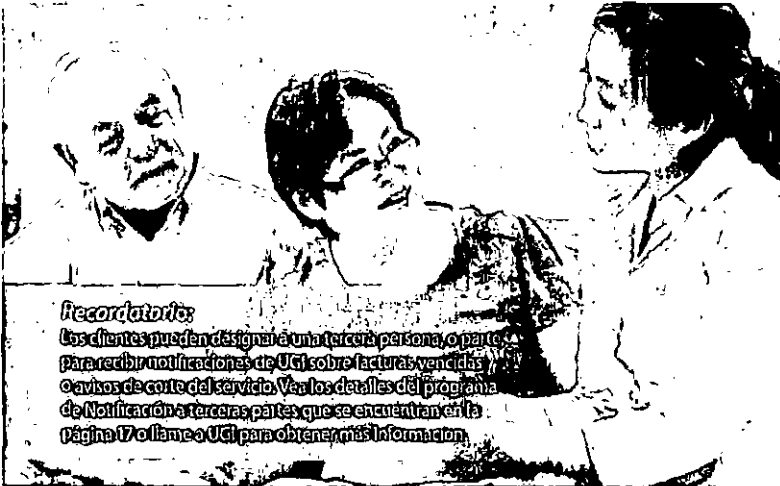
Con el plan de Deducción automática, usted puede hacer que la cantidad de su factura de UGI sea automáticamente transferida desde su cuenta de cheques o de ahorros cada mes.

Disfrute los beneficios:

- ▶ Registrarse el gratis
- ▶ No habrá cargos por pago atrasado, su cuenta será pagada a tiempo cada vez, incluso si usted está de vacaciones.
- ▶ Sin compromiso, cancele el plan de Deducción automática cuando usted quiera comunicándose con nosotros.

Visite www.ugi.com o llámenos hoy para registrarse en el plan de deducción automática.





Recordatorio:

Los clientes pueden designar a una tercera persona, o parte, para recibir notificaciones de UGI sobre facturas y cambios de corte del servicio. Ver los detalles del programa de Notificación a Terceras Partes que se encuentran en la página 17 o llame a UGI para obtener más información.

Fondo energético 'Operación Compartir'

La Operación Compartir es un programa 501(c)(3) basado en subsidios y es financiado por UGI y las contribuciones voluntarias de los clientes. Este programa está diseñado para ayudar a las familias de bajos ingresos que están teniendo dificultades a corto plazo para pagar. Para recibir más información, por favor visite www.ugioptionsshare.org.

Servicios de referencia y evaluación de asistencia al cliente (CARES por sus siglas en inglés)

A través de una red de agencias sociales locales, este programa ofrece ayuda personal a aquellos con necesidades especiales que están atravesando por una crisis temporal.

Programa de asistencia de energía para hogares con bajos ingresos (LIHEAP por sus siglas en inglés)

Este es un programa federal GRATIS que ofrece ayuda financiera a los clientes que califican y que cumplen con los requisitos de ingresos. El programa incluye un posible subsidio para 'casos de crisis' si su hogar está en peligro inmediato de quedarse sin calefacción.



Programas de asistencia para clientes

UGI entiende que administrar los costos de energía puede ser difícil. Para ayudar a los clientes que tienen necesidades especiales o bajos ingresos, UGI ofrece un número de programas de asistencia.

Si usted, o alguien que usted conoce, necesita ayuda para pagar, por favor visítenos en www.ugi.com/customerserviceassistance o llame al (800) UGI-WARM, (800) 844-9276 para verificar si cumple con los requisitos para participar en cualquiera de estos programas de ayuda.

Programa de asistencia a clientes (CAP por sus siglas en inglés)

El programa CAP ofrece un pago mensual basado en un porcentaje del ingreso familiar bruto, el tamaño de su familia y el consumo de energía. En la mayoría de casos, este programa ayudará a que las facturas de UGI sean más razonables. Cuando las facturas de CAP son pagadas en la fecha de vencimiento o antes, la diferencia entre la cantidad facturada y la cantidad real puede ser condonada.

Programa de reducción del consumo para hogares con bajos ingresos (LIURP por sus siglas en inglés)

El programa LIURP ofrece medidas gratis para conservar energía en los hogares con alto consumo y bajos ingresos para ayudar a que las facturas de energía sean más razonables. Las posibles medidas para conservar energía pueden incluir: aislante para el techo; aislante para pisos, conductos y tuberías de agua caliente; selladores y juntas de goma; reparaciones al calentador de gas natural; y reductores de flujo de agua.

Usted debe ser cliente residencial de UGI y haber permanecido en la misma dirección por al menos 12 meses antes de cumplir los requisitos para participar en el programa LIURP.

La ayuda puede estar disponible para aquellos que viven con ingresos fijos.



Si usted o alguien que usted conoce necesita ayuda para pagar, por favor llame al (800) UGI-WARM (800) 844-9276.



Aprenda a administrar sus costos de energía.

Utilice la energía prudentemente

Los siguientes pasos pueden reducir las facturas de calefacción hasta en un 10 por ciento cada año.

1. Use termostatos programables y fije la temperatura entre 65°F y 70°F durante el invierno, y a 58°F cuando esté fuera de casa por más de varias horas. Por cada grado menos, usted cortará el consumo de energía de 3 a 5 por ciento.
2. Plante árboles que pierdan las hojas en el lado sur y oeste de su casa para ayudar a proveer una sombra fresca en el verano y permitir que brille el cálido sol del invierno.
3. Reemplace o limpie los filtros del calefactor una vez al mes durante la temporada de calefacción. Siempre programe un chequeo/limpieza antes de cada temporada con un contratista licenciado de calefacción/ventilación/refrigeración en el invierno y el otoño. Si su sistema de calefacción tiene más de 15 años, o si su unidad de enfriamiento tiene más de 12 años, considere reemplazarla con un modelo eficiente nuevo.
4. El aire cálido sube, así que use los registros para dirigir la corriente de aire cálido a lo largo del piso. Remueva los obstáculos para permitir que el

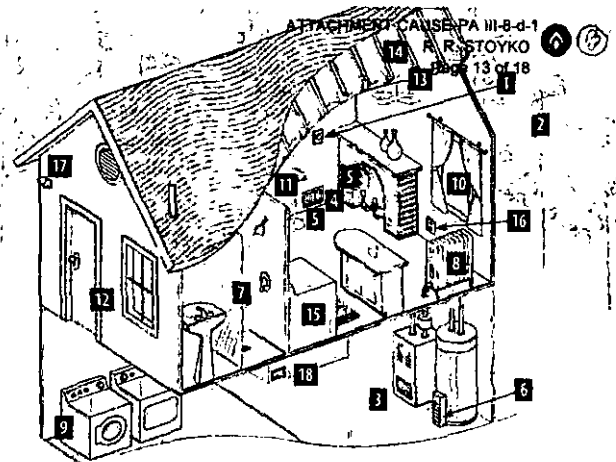
aire fluya libremente a través de cada habitación.

5. Cierre los conductos de ventilación y las puertas de las habitaciones que no utilice, y cierre los reguladores en las chimeneas que no se estén utilizando para evitar que el aire se escape.
6. Ajuste la temperatura del calentador de agua a 120°F para reducir sus facturas de calentamiento de agua y también para asegurar el uso de temperaturas apropiadas para su familia.
7. Los cabezales de ducha tradicionales usan el doble de agua necesaria para tomar una ducha minuciosa. Instale reductores de flujo para conservar agua y reducir el uso de energía. Repare los escapes y las goteras en todos los grifos. Un pequeño escape puede desperdiciar más de 300 galones al mes.
8. Coloque una hoja de papel aluminio entre el radiador y la pared para reflejar el calor de la pared hacia el cuarto.
9. Use la lavadora y la secadora con cargas de ropa llenas.
10. En días soleados, abra las cortinas y persianas para permitir que entre el calor del sol. Cíerrelas bien por las noches para aislar su casa del aire frío del exterior.



¿Quiere recibir otros buenos consejos?

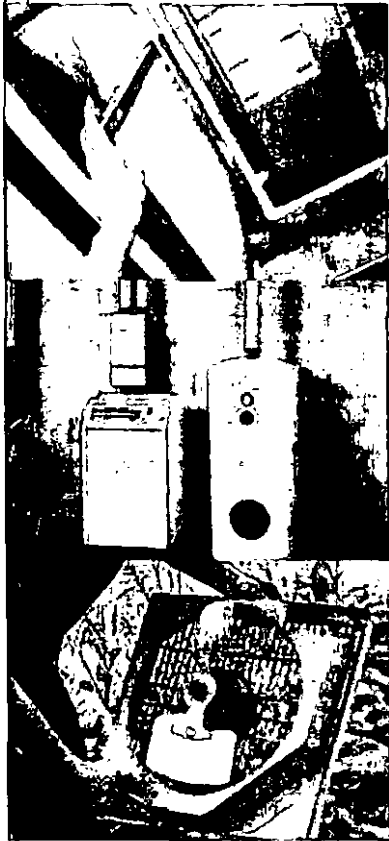
Conéctese con nosotros en [facebook.com/ugiutilities](https://www.facebook.com/ugiutilities)



11. Si usted va a estar fuera de una habitación por 3 minutos o más, apague las luces. Además, escoja colores claros para las paredes para reflejar la luz natural, permitiéndole así usar menos luz artificial. Apague las luces en los lugares en donde haya suficiente luz natural.
12. Selle todas las grietas y brechas alrededor de la casa para reducir la pérdida de energía. Use selladores y juntas de goma alrededor de las ventanas y los marcos de las puertas para reducir la pérdida de energía a través de las grietas pequeñas y brechas.
13. En el verano, cambie la dirección de los abanicos de techos para usar el movimiento que va contra las manecillas del reloj para arrojar aire fresco. En el invierno, cambie a una velocidad más lenta y cambie la dirección para que vaya con las manecillas del reloj para forzar el aire cálido a esparcirse a la sala de estar.
14. Es crucial tener un aislamiento apropiado del ático para la eficiencia de energía del hogar en el verano y el invierno. Asegúrese de que usted tenga los niveles adecuados de aislante.
15. Use la máquina lavaplatos solamente cuando esté llena, y use el control de ahorro de energía (si está disponible). Abra la máquina después del ciclo de enjuague y deje que los platos se sequen al aire. El horno microondas usa hasta 80% menos de electricidad que un horno regular. Con la estufa, use ollas y sartenes en los quemadores del mismo tamaño. Use tapas para mantener el calor adentro. Con los hornos, ¡no abra la puerta para mirar! En lugar de esto, use la ventana del horno y encienda la luz en lugar de abrir la puerta. Verifique la configuración del refrigerador para asegurar que está usando la mejor configuración. Fije la temperatura a 36°F-38°F para el refrigerador y 0°F-5°F para el congelador. Mantenga los compartimientos llenos, pero no bloquee el abanico de circulación.
16. Selle las grietas en los tomacorrientes eléctricos con tapas económicas de espuma para tomacorrientes para controlar los escapes de aire.
17. Con relación a las luces exteriores, use unidades de fotocélula, sensores de movimiento y relojes automáticos para reducir la cantidad de tiempo que las luces están encendidas.
18. Cubra y selle los agujeros y grietas alrededor de la plomería, tuberías y redes de conductos.



Ahorre con estos consejos de mantenimiento de los aparatos domésticos.



Consejos de mantenimiento de los aparatos domésticos

Los aparatos domésticos que usted usa cada día pueden ayudar a crear un hogar más eficiente energéticamente. Siga estos consejos de mantenimiento para que sus aparatos sigan funcionando de forma eficiente - ¡ahorrándole energía y dinero!

Equipo de calefacción

- ▶ Reemplace o limpie los filtros del calefactor por lo menos una vez al mes durante la temporada de calefacción.
- ▶ Asegúrese de que un técnico calificado revise su calefactor o caldera una vez al año.
- ▶ Para limitar la cantidad de energía que se pierde debido a la fricción, y para extender la vida útil del equipo, lubrique los cojinetes de la bomba y el ventilador regularmente siguiendo las recomendaciones del fabricante.

Calentador de agua

- ▶ Si tiene un calentador de agua nuevo, cada mes drene varias cubetas de agua de la válvula de drenaje que se localiza cerca del fondo de la unidad. Esto evitará que se acumulen depósitos y sedimentos minerales dentro del calentador de agua.
- ▶ Mantenga el área del quemador libre de polvo y suciedad.
- ▶ Almacene combustibles o sustancias inflamables lejos del calentador de agua.
- ▶ Para los calentadores de agua de gas, verifique la llama dos veces

al año para asegurarse que sea completamente azul -no amarilla ni anaranjada. Use aislante en las tuberías suplidoras de agua caliente para reducir la pérdida de calor. Las ferreterías venden kits de aislante para tuberías.

- ▶ Repare inmediatamente cualquier gotera en los grifos.

Aire acondicionado

- ▶ Chequee y limpie los filtros de aire cada mes.
- ▶ Limpie las bobinas del condensador exterior una vez al año.
- ▶ Pida a un técnico calificado que revise su equipo de enfriamiento cada año.
- ▶ Los áticos deben estar ventilados para liberar la acumulación de calor causada por el sol. Si es necesario, mejore el flujo de aire añadiendo o extendiendo los conductos de ventilación.

Refrigerador/Congelador

- ▶ Llene su refrigerador por completo, pero no hasta el punto en que las puertas no puedan cerrarse o que el aire no pueda circular.
- ▶ Limpie con la aspiradora las bobinas del condensador (debajo o detrás de la unidad) aproximadamente cada tres meses.
- ▶ Verifique la condición de las juntas de la puerta colocando un billete de un dólar entre el marco y la puerta, y ciérrela. Si el billete puede ser sacado al halarlo suavemente, la puerta debe ser ajustada o las juntas deben ser reemplazadas.

Estufa

- ▶ Mantenga las áreas alrededor de los quemadores y las llamas del piloto libres de suciedad y partículas de comida.
- ▶ Limpie las tapas de los quemadores después de cada uso para retirar los depósitos originados por salpicaduras.

- ▶ Mantenga los paneles reflectantes que se encuentran debajo de los quemadores de la estufa resplandecientes y limpios.
- ▶ Use el ciclo de auto-limpieza sólo para los trabajos grandes de limpieza. Comience el ciclo justo después de cocinar mientras el horno aún está caliente, o espere hasta que sea tarde en la noche cuando el uso de electricidad es más bajo.

Secadora de ropa

- ▶ Limpie el filtro de pelusa después de cada carga.
- ▶ Periódicamente, limpie la pelusa de los ductos de escape, el conducto de ventilación y la capota abatible de ventilación (localizada en el exterior de la casa).
- ▶ No seque materiales que estén manchados con solventes de limpieza, cera o pintura; hule espuma o artículos cubiertos de goma; o artículos de fibra de vidrio.





Ahorre dinero en su factura eléctrica con estos programas.

Reembolsos para los clientes del servicio eléctrico

UGI ofrece muchos programas y reembolsos para ayudar a los clientes de servicio eléctrico a ahorrar. Aprenda más sobre nuestros programas en este día, y vea si usted es elegible para recibir descuentos, reembolsos y más.

Programa de reciclaje de electrodomésticos

Recicle ese viejo refrigerador o congelador que gasta energía. Para ser elegible, el electrodoméstico a ser reciclado debe estar conectado y funcionando cuando

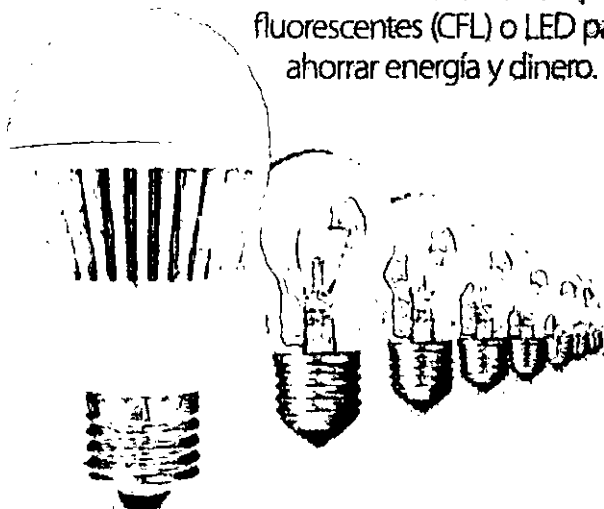
sea recogido, y tener al menos 10 pies cúbicos en tamaño. Siempre que cumpla con los requisitos, nosotros vendremos a recoger el electrodoméstico GRATIS ¡y usted recibirá un reembolso!

Programa de reembolso de electrodomésticos residenciales

Reduzca sus gastos de energía con electrodomésticos de alto rendimiento. Compre e instale equipos elegibles y de alto rendimiento y usted obtendrá grandes ahorros con reembolsos generosos y facturas más bajas de energía. ¡Los ahorros que usted establezca pueden hacer la diferencia!

ATTACHMENT CAUSE-PA 11-8-4-1
R. R. STOYKO

Use bombillas energéticamente eficientes, tales como las bombillas compactas fluorescentes (CFL) o LED para ahorrar energía y dinero.




Iluminación con energía eficiente



Deshágase de esas viejas e ineficientes bombillas incandescentes y ahorre energía y dinero cambiándolas por bombillas CFL o LED más eficientes. UGI ofrece significativos descuentos en bombillas de alta eficiencia en las tiendas participantes. Para ver una lista completa de las tiendas cercanas a usted, por favor visite www.theenergyguyatugi.com.

Además, si usted es un cliente de UGI que participa en el programa de Asistencia al cliente (CAP, por sus siglas en inglés), UGI le enviará por correo un paquete de bombillas energéticamente eficientes GRATIS. Vea los detalles del programa CAP en la página 20 o llame al (800) UGI-WARM, (800) 844-9276 para obtener más información.

Programa de cambio de combustible

Los calentadores solares térmicos de agua y los electrodomésticos de gas natural tienen la ventaja de costo de funcionamiento anual sobre sus equivalentes eléctricos. Así que hacer el cambio trae ahorros. Y usted ahorrará mucho más con los generosos reembolsos al comprar e instalar equipos nuevos y energéticamente eficientes.

Visite www.theenergyguyatugi.com para aprender más. Si usted no es un cliente del servicio eléctrico de UGI, verifique con su proveedor, ya que otras compañías de servicio eléctrico pueden ofrecer programas de reembolsos similares.





Conozca sus derechos y responsabilidades.

Un mensaje importante para los clientes de UGI:

La Comisión de Servicios Públicos de Pennsylvania (PUC, por sus siglas en inglés) ha actualizado sus **Estándares y prácticas de facturación para el servicio residencial**.

Sus Derechos y responsabilidades como cliente de servicios públicos es un folleto preparado por la PUC para explicar las reglas con relación a las prácticas de facturación, crédito, manejo de disputas y de corte de las compañías de servicio público.

Este útil folleto también incluye información sobre varias opciones de pago para su factura de servicios públicos, información para entender los componentes de su factura de servicios públicos, las políticas con relación a los depósitos de seguridad, los pasos y las reglas sobre los cortes de servicio, y cómo buscar servicios de electricidad o gas natural.

Para leer o imprimir una copia del folleto *Derechos y responsabilidades*, usted puede visitar la página web de UGI, www.ugi.com.

UGI Utilities, Inc. continuará proporcionándole servicios públicos seguros y confiables, facturas claras y concisas y políticas justas. Usted, el consumidor, debería conocer sus derechos y cumplir sus responsabilidades para mantener su servicio:

Como cliente de los servicios públicos residenciales, usted tiene **DERECHO** a:

- ▶ un servicio seguro y confiable.
- ▶ una factura clara, concisa y precisa.
- ▶ políticas justas de crédito y depósito.
- ▶ conocer cómo se calcula su factura y cómo saber si es demasiado alta.
- ▶ cuestionar o estar en desacuerdo con su compañía de servicios públicos.
- ▶ **privacidad personal**. *UGI tiene la responsabilidad de proteger su información personal en contra del uso no autorizado.*



ATTACHMENT CAUSE-PA III-8-d-1

R: R. STOVKO

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Juntos, tenemos
la energía para
hacer más.*

Como cliente de los servicios públicos residenciales, usted también tiene la **RESPONSABILIDAD** de:

- ▶ pagar su factura a tiempo.
- ▶ proveer a UGI acceso a su medidor.
- ▶ dar a UGI al menos 7 días de aviso antes de mudarse o si desea descontinuar el servicio. *Si usted no notifica a UGI, usted sigue siendo responsable de pagar las facturas.*

Protecciones especiales

- ▶ usted podría calificar para tener protecciones especiales si usted:
 - ▶ es víctima de violencia doméstica y tiene una orden de protección contra el abuso.
 - ▶ vive en un hogar de bajos ingresos.
 - ▶ está gravemente enfermo o si un miembro de la familia está gravemente enfermo.

Se exige que usted provea pruebas a su proveedor.

Bienvenido a casa.

Únase a la conversación.

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 twitter.com/ugireads

 youtube.com/ugiutilities

 <http://blog.ugi.com>

 <http://ugi.com/linkedin>

Descubra todo lo que UGI hace por los hogares
y los negocios en www.ugi.com



Energía para hacer más®



UGI ofrece una variedad de formas convenientes para pagar su factura.

CONTACTO DE EMERGENCIA DE UGI:

Si usted alguna vez huele gas, si tiene una emergencia relacionada con el gas, o si tiene una interrupción en el servicio eléctrico, llame a UGI al número que se encuentra a continuación. NO use nuestros canales de medios sociales para reportar alguna emergencia de gas.

Para reportar una fuga de gas, un olor a gas, o una interrupción en el suministro eléctrico, llame al (800) 276-2722 (disponible las 24 horas).

Cómo contactar a UGI

Como su proveedor de energía, UGI hace que sea fácil para usted conectarse con nosotros. Usted encontrará información útil en nuestra página web, además, usted puede llamar a nuestros números de teléfono para encontrar las respuestas que usted necesita, o para administrar su cuenta de UGI.

Contacte a UGI

Utilice estos números para obtener respuestas para sus preguntas sobre el servicio energético o para administrar su cuenta de UGI.

- ▶ Preguntas sobre facturación y su cuenta:
(800) 276-2722
- ▶ Hacer un pago:
(877) 503-2956 (Lea la guía para ver más opciones de pago)
- ▶ Programas de asistencia energética:
(800) 844-9276
- ▶ Créditos y cobros:
(800) 276-2722
- ▶ Para personas con impedimentos auditivos:
(800) 654-5988

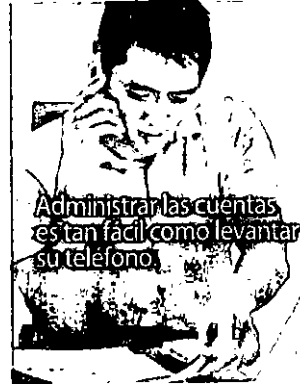
Usted también puede encontrar respuestas visitando nuestra página de internet www.ugi.com.

Pague su factura por correo

UGI Utilities
P.O. Box 15523
Wilmington, DE 19886-5523



Energía para hacer más*



Opciones de autoservicio por teléfono

Las opciones y transacciones de autoservicio pueden ser completadas llamando al **(800) 276-2722**. Las opciones incluyen:

- ▶ Obtener el saldo de la cuenta e información sobre pagos recientes
- ▶ Obtener la fecha de su próxima lectura del medidor
- ▶ Solicitar una extensión de pago una sola vez
- ▶ Registrarse en el plan de pago Budget Billing
- ▶ Obtener información sobre:
 - Pagos automáticos de facturas
 - Ayuda energética para personas con bajos ingresos



Opciones de autoservicio usando la página de internet

Visite www.ugi.com para completar los siguientes servicios y transacciones en línea:

- ▶ Ver un resumen de la cuenta
- ▶ Pagar su factura
- ▶ Obtener una lista de las ubicaciones de las agencias autorizadas para realizar pagos
- ▶ Comprar créditos para regalarlos
- ▶ Administrar su cuenta
- ▶ Encontrar un contratista
- ▶ Obtener asistencia para pagar la factura
- ▶ Hacer donaciones para la Operación Compartir
- ▶ Iniciar, detener o trasladar el servicio
- ▶ Registrarse para Budget Billing

Además, usted puede contactarnos si tiene preguntas o si necesita información sobre:

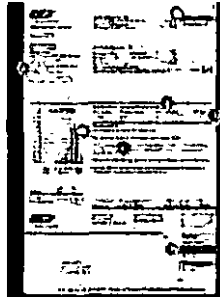
- ▶ Su factura de gas natural
- ▶ Preguntas para el departamento de crédito o sobre facturas vencidas
- ▶ Para obtener información sobre los programas de Asistencia para clientes
- ▶ Su cuenta de UGI



Home | Customer Services | Billing and Payment | Understanding Your Natural Gas Bill

Account Summary
 View Your Bill Online
 Pay Your Bill
 Payment Plans
 Understanding Your Electric Bill
 Understanding Your Natural Gas Bill
 View Bill Inserts
 Meter Reading

Understanding Your UGI Natural Gas Bill



1. **Your Customer Number** - Please have this number ready when you contact us about your account.
2. **How to Contact UGI** - For questions regarding your bill or service, use this telephone number and mailing address.
3. **Next Scheduled Reading** - This is the scheduled date of your next UGI meter reading.
4. **Meter Reading** - Shows the meter reading for the current billing period and amount of energy used: natural gas is shown in CCFs (1 CCF = 100 cubic feet of gas) and electric in kWh.
5. **Price to Compare** - This is your current Price to Compare when shopping for an alternate energy supplier.
6. **Messages** - This section highlights your important messages from UGI regarding programs you may participate in, such as budget billing and the "GET Gas" program.
7. **Due Date and Amount Due** - Reflects the amount currently owed to UGI and the date your payment is due.

Entendiendo su factura de UGI

1. **Su número de cliente** - Por favor tenga este número a la mano cuando nos contacte con relación a su cuenta.
2. **Cómo contactar a UGI** - Para hacer preguntas sobre su factura o servicio, use este número de teléfono y dirección postal.
3. **Su próxima lectura programada del medidor** - Esta es la fecha programada de su próxima lectura de medidor de gas de UGI.
4. **Información sobre la lectura del medidor** - Muestra la lectura del medidor para el período actual de facturación y la cantidad de gas usado en CCF (1 CCF = 100 pies cúbicos de gas).
5. **Precio a comparar** - Su precio actual para que lo compare a buscar un proveedor alternativo de energía.
6. **Mensajes** - Esta sección destaca los mensajes importantes de UGI respecto a los programas que usted pueda participar en tales como el programa "GET Gas" y facturación de presupuesto.
7. **Fecha de vencimiento/Cantidad a pagar** - Refleja la cantidad adeudada actualmente UGI y la fecha de su pago.

Account Number: _____

REMINDER

Dear CAP Customer,

Your most recent CAP bill is now 15 days past due. Failure to pay this bill can result in termination of your service. To stay in good standing in CAP you must pay your past due amount now. If you have any questions regarding your past due CAP bill, please call the UGI credit department at 1-800-276-2722

AVISO

Su factura más reciente de CAP esta atrasada por 15 días. El no pagar esta cuenta puede causar la pérdida de su servicio. Para quedarse al día en CAP, usted tiene que pagar su cantidad atrasada ahora. Si usted tiene alguna pregunta acerca la cantidad atrasada de CAP, favor de llamar al departamento de credito de UGI al 1-800-276-2722.

Sincerely,

**Solicitud de CAP de UGI
(Solicitud del Programa de Asistencia a Clientes)**

Apellido: _____ Nombre: _____ Inicial del segundo nombre: _____

Dirección del servicio: _____ ¿Tiene cuenta de calefacción? Sí/No

N.º de cliente de UGI: _____ Teléfono Casa: _____ Teléfono laboral: _____

Miembros e ingresos del grupo familiar (indique todas las fuentes de ingresos de cada miembro del grupo familiar):

Nota: las cifras deben representar los ingresos brutos mensuales.

Nombre	N.º de seguro social	Fecha de nacimiento	H/M	Fuentes de ingresos	Cantidad de ingresos
<i>Adjunte hojas adicionales, si es necesario:</i>					Total de ingresos brutos mensuales
					\$

Gastos del hogar (indique todos los gastos en su hogar):

Gastos	Cantidad	Gastos	Cantidad
Hipoteca/alquiler		Alimentos (sin vales de comida)	
Agua/desagüe		Electricidad	
Transporte		Seguro	
Médico/recetas		Teléfono	
Cuidado de día /manutención		Residuos/reciclaje	
Calefacción (no gas o eléctrica)			

¿Recordó hacer lo siguiente?

Proporcionar constancia de los ingresos para el período más reciente de 30 días, 90 días o 12 meses. Consulte la carta adjunta para determinar si la constancia de ingresos es necesaria.

Completar toda la información necesaria con claridad y de manera completa.

Firmar el formulario de Consentimiento y Exención de Responsabilidad, como así también el de Veracidad en la Declaración.

Las solicitudes no se procesarán sin:

- El Consentimiento y Exención de Responsabilidad firmado, junto con la Veracidad de la Declaración, que se encuentran en el reverso de este formulario.
- La constancia obligatoria de ingresos

CONSENTIMIENTO Y EXENCIÓN DE RESPONSABILIDAD del Programa de Asistencia a Clientes (CAP)

Acepto y doy el consentimiento para que UGI comparta la información incluida en mi solicitud y toda otra información que esté relacionada con mi cuenta de cliente con los empleados, representantes, agentes, contratistas o subcontratistas empleados para administrar el CAP y evaluar mi solicitud para la aceptación en el CAP. Además, por la presente eximo y libero de responsabilidad a UGI, sus empleados, representantes, agentes, contratistas y filiales de todo reclamo relacionado con mi solicitud, mi participación en el CAP y la administración y las evaluaciones del CAP de UGI.

PARTICIPANTE DEL CAP (EN LETRA DE IMPRENTA)

FECHA

DIRECCIÓN

NÚMERO DE CLIENTE:

VERACIDAD DE LA DECLARACIÓN del Programa de Asistencia a Clientes (CAP)

La información en esta solicitud es veraz y completa a mi leal saber y entender. Los empleados, representantes, agentes, contratistas y subcontratistas de UGI tienen el derecho a verificar mis ingresos y gastos, si es necesario. Comprendo y acepto que proporcionar declaraciones falsas o incompletas en esta solicitud constituirá una causa para rechazar mi solicitud o eliminarme del CAP.

FIRMA DEL PARTICIPANTE DEL CAP

FECHA

Account Number: _____

Reminder

Dear CAP Customer,

Recently, UGI has notified you that it is time to recertify. CAP customers are required to provide verification of income and valid identification in order to continue CAP participation.

Please follow the instructions provided by UGI to complete your recertification in a timely manner. Failure to comply with this requirement may result in your CAP payment being increased to your average bill or removal from the program.

Please contact our office if you have questions regarding your recertification.

Aviso

Recientemente, UGI le notifico que es necesario verificar su información para continuar con su participación en CAP.

Favor de seguir las instrucciones proveído por UGI de verificar su información lo más pronto posible. Si no cumples este requisito vamos aumentar la cantidad de su pago al promedio de la cuenta o puedes ser removido del programa.

Favor de comunicarse con nuestra oficina si tiene preguntas acerca del proceso.

Sincerely,

REGLAS GENERALES PARA EL
PROGRAMA DE ASISTENCIA AL CLIENTE (CAP) DE UGI

- Las facturas del Programa de Asistencia al Cliente (Customer Assistance Program, CAP) deben pagarse a tiempo y no deben estar sujetas a extensiones de pago o acuerdos de pago. El incumplimiento de los pagos puntuales del programa CAP puede dar como resultado la cancelación del servicio.
- A los clientes del programa CAP se les requiere que soliciten el Programa de Asistencia de Energía para Hogares de Bajos Ingresos (Low Income Home Energy Assistance Program, LIHEAP).
- Los participantes del programa CAP deben recertificar y proporcionar una prueba de ingresos. Para recertificar, los participantes deben:
 - Para los participantes del programa LIHEAP: recibir una ayuda económica en efectivo o de crisis dentro de los últimos 12 meses en la cuenta UGI. Cuando las pautas de ingresos del programa LIHEAP son las mismas que las del programa CAP; a los participantes del programa LIHEAP solo se les solicitará que proporcionen documentación sobre ingresos y el ocupante cada tres años.¹
 - Para las personas que no participan en el programa LIHEAP: la documentación de ingresos y del ocupante debe proporcionarse anualmente a fin de verificar que los ingresos familiares del participante sean iguales o inferiores al 150 % actual de las Pautas Federales de Ingresos de Pobreza.

Si no realiza la recertificación en un plazo de dos ciclos de facturación posteriores a haber sido notificado para hacerlo puede dar como resultado un aumento en la cantidad del programa CAP hasta la factura promedio o la eliminación del programa.

- Los participantes deben informar cualquier cambio en la cantidad o los ingresos del grupo familiar a la agencia de su programa CAP respectiva.
- El consumo será supervisado. Los clientes de CAP de alto consumo deben completar un cuestionario y participar en una sesión de educación sobre energía con la agencia local del programa CAP. Las sesiones le ayudarán al cliente a entender sus patrones actuales de utilización y le proporcionarán información de utilidad sobre el ahorro de energía. La no participación en los controles de alto consumo dará como resultado la eliminación del programa.
- Las clasificaciones de cuentas que no son elegibles para el programa CAP y que serán eliminadas son las siguientes:
 - instalaciones de atención de salud;
 - propietario/inquilino (la cuenta está a nombre del dueño);
 - contribuyente/ocupante (el cliente/contribuyente no reside en la propiedad);
 - carga extranjera (un metro suministra más que una unidad); y
 - clientes que optan elección de gas natural/electricidad.
- La detección de la utilización no autorizada dará como resultado la eliminación inmediata del programa CAP.

¹ Históricamente, los criterios de ingresos para el programa CAP han coincidido con los del programa LIHEAP. En caso de que los requisitos de ingreso difieran, UGI informará al cliente del programa CAP que participa en el programa LIHEAP acerca de la responsabilidad de recertificar anualmente.

Si no se cumplen las reglas del programa indicadas anteriormente, usted puede ser eliminado del programa CAP y perderá los siguientes beneficios del programa:

- **Pago mensual del programa CAP:** CAP proporciona una opción de pago que se basa en un porcentaje de ingresos, facturación promedio o pago mínimo permitido. El pago del programa CAP es la mejor opción de pago que UGI puede ofrecer.
- **Aplicación de los créditos de CAP:** un crédito de CAP es la diferencia entre la factura por consumo mensual y el pago requerido de CAP. Cuando la factura de consumo es superior a la cantidad de CAP, el crédito de CAP se aplica mensualmente cuando se haya recibido el pago de CAP en su totalidad.
- **Perdón de los atrasos anteriores al programa:** los atrasos anteriores al programa son los saldos vencidos adeudados al momento de la inscripción en el programa CAP. UGI perdonará estos saldos de los atrasos mensualmente durante 36 meses² hasta la recepción de los pagos mensuales de CAP en su totalidad.

Otras razones por las cuales puede considerarse que un cliente está en situación de incumplimiento y ser eliminado del programa son las siguientes:

- no cumplir con la obligación de buena fe, honestidad y trato justo mientras trabaja con la agencia de administración de CAP o una de las compañías de UGI;
- cualquier motivo por el cual el servicio del cliente pueda cancelarse en virtud del Capítulo 56 o Capítulo 14; y
- la quiebra: al momento de presentar la quiebra, todas las cantidades a cobrar que pueden incluir los atrasos anteriores al programa, se regirán según la jurisdicción del tribunal de quiebra y ya no será elegible para recibir los beneficios de CAP.

Una vez que haya sido eliminado del programa CAP, deberá pagar su saldo total de UGI³.

² UGI seguirá esta práctica pero no proporcionará menos de \$10.00 por mes al saldo atrasado.

³ El saldo de UGI incluye todos los dólares y facturas impagas que no hayan sido perdonadas.

Response of UGI to CAUSE-PA III-9

CAUSE-PA-III-9 (Prepared by Robert Stoyko)

See Attachment to CAUSE-PA II-5-1. Do UGI's Universal Service program subcontractors have access to UGI's language interpretation service, "Certified Languages"? If yes, please explain any associated costs and describe the procedure used for subcontractors to access the language interpretation services. Attach any relevant policies, contracts, or other documents outlining said policies and procedures and evidencing associated expenses.

Response:

No. The Company does not provide subcontractors access to UGI's language interpretation service. The Company does not track what language interpretation service the subcontractors utilize.

No Digital Attachments Found.

6/2/16 HJM

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al., :

v. :

UGI Utilities, Inc. – Gas Division :

Docket No. R-2015-2518438

SURREBUTTAL TESTIMONY OF MARIELLE MACHER, ESQ.

ON BEHALF OF

**THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)**

May 25, 2016

1 **PREPARED SURREBUTTAL TESTIMONY OF MARIELLE MACHER, ESQ.**

2 **Q: Please state your name, occupation and business address.**

3 A: Marielle Macher, Lawyer, Community Justice Project, 118 Locust Street, Harrisburg PA
4 17101

5 **Q: Did you previously submit testimony in this proceeding?**

6 A: Yes. I submitted direct testimony, pre-marked as CAUSE-PA Statement 2.

7 **Q: What is the purpose of your surrebuttal testimony?**

8 A: The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of Chris
9 Ann Rossi, UGI Statement 12-R. I will not reiterate the information and arguments presented in
10 my direct testimony, but will instead focus on addressing several areas in which I believe Ms.
11 Rossi is mistaken.

12 In particular, I will respond first to Ms. Rossi's assertion that Title VI of the Civil Rights
13 Act is "beyond the Commission's subject matter jurisdiction," insinuating that UGI's compliance
14 with the Act is therefore irrelevant. (UGI St. 12-R at 40). To the contrary, UGI's compliance
15 with Title VI is specifically relevant to determining UGI's quality of service, and to assess
16 whether individuals in the service territory are afforded reasonable access to service, regardless
17 of their national origin.

18 Next, I will respond to Ms. Rossi's assertion that asking callers if they require language
19 assistance "would be an unnecessary burden, and possibly insulting to the great majority of the
20 Company's customers." (UGI St. 12-R at page 40, lines 17-18) As I will discuss below, prompts
21 at the beginning of a call regarding language access are standard across this and other customer
22 driven industries, and should be adopted by UGI to minimize language access barriers for
23 customers who are Limited English Proficient (LEP).

1 Finally, I will respond to Ms. Rossi’s assertion that UGI accepts alternative identification
2 in lieu of a Social Security Number (SSN), and that the alternative documentation UGI accepts is
3 sufficient to overcome the barriers for foreign-born customers seeking to establish UGI service.
4 (UGI St. 12-R at 41). Even if call center employees are aware that UGI accepts alternative
5 identification, the list of alternative identification accepted by UGI appears to discriminate
6 against individuals from countries other than the United States and Canada.

7 **Q: Moving to your first point, please respond to Ms. Rossi’s assertion that Title VI is**
8 **“beyond the Commission’s subject matter jurisdiction.”**

9 A: Ms. Rossi’s testimony was in response to my direct testimony, which raised Title VI
10 language access requirements to ensure nondiscrimination based on national origin. Ms. Rossi
11 asserted, on advice of counsel, that the PUC has no subject matter jurisdiction over Title VI
12 claims. However, it was not my assertion in direct testimony, nor is it now, that the Commission
13 should engage in an enforcement action against UGI based on Title VI compliance – though it is
14 possible that the a complaint could be filed before the United States Department of Health and
15 Human Services (HHS) in the future.

16 **Q: Given that you are not suggesting that the Commission enforce compliance with**
17 **Title VI as to UGI, why are UGI’s language access policies nonetheless relevant in this**
18 **proceeding?**

19 A: As I discussed in my direct testimony, UGI’s lack of full compliance with the basic
20 language access requirements under Title VI demonstrates that UGI’s policies and practices do
21 not afford equal access to utility service (including universal service programs) to customers who
22 are limited English proficient (LEP). This is relevant to UGI’s quality of service and ability to
23 provide service to everyone in its service territory.

1 **Q: Ms. Rossi asserts that asking all callers if they require language assistance “would**
2 **be an unnecessary burden” to UGI, and is not necessary to serve its LEP population (UGI**
3 **St. 12-R at 39, lines 11-15 and 40, lines 13-18). Do you agree?**

4 A: No. Ms. Rossi states that UGI Gas uses census reporting to determine the languages
5 spoken in its service territory, but then uses what it calls “demand reporting” to determine the
6 need for language interpretation. (UGI St. 12-R, at 39). As I understand it, the Company designs
7 its language access policies on how many people request interpretation services, not on census
8 data which reports the likely number of those in need of interpretation service. (Id.) As I
9 discussed in depth in my direct testimony, relying on affirmative requests for interpretation
10 services is not sufficient to determine need. (CAUSE-PA St. 2 at 7, 9). If unaware of the
11 availability of interpretation services, LEP individuals may either struggle through the call on
12 their own, rely on third parties to make the call for them, or avoid calling and/or establishing
13 service altogether. Each of these alternatives is unacceptable, as it does not provide the LEP
14 individual with equal access to establishing and/or managing their utility account.

15 Ms. Rossi states that “[w]ithin the first few seconds of a call, the contact center
16 representative is able to assess if a caller is having difficulty.” (UGI St. 12-R, at 40). Through
17 discovery, UGI witness Robert Stoyko further explained: “Our Contact Center Representatives
18 (CCR) begin every call with “Thank you for calling UGI, this is Chris speaking. How may I help
19 you?” If the caller begins to respond in another language, or if the caller is difficult to understand
20 due to a language barrier, the CCR will ask for consent to connect to a translator.”¹ UGI’s
21 practice of identifying customers in need of interpretive service requires its call center employees

¹ UGI Response to CAUSE-PA-VII-1(a), attached hereto as Appendix B.

1 to use their subjective judgment based on factors such as the individual's accent, which will
2 undoubtedly miss many LEP individuals whose language barrier is not so readily apparent.

3 Currently, UGI has five automated prompts to select from before reaching a customer
4 service representative: (1) report a gas leak / smell gas, (2) power outage / electric emergency,
5 (3) residential customers, (4) business customers, (5) appliance repair work / service contracts /
6 meter or equipment inquiries.² To avoid having call center employees guess at whether a
7 customer requires interpretative services based on a customer's accent, UGI should be required
8 to program one of its initial automated call-in prompts in Spanish³ for callers to select if they
9 need interpretation services. The prompt could be as simple as: "Para Español, marque seis,"
10 which translates to: "For Spanish, press 6." This short prompt would signal to UGI's Spanish
11 speaking customers that interpretation services are available, and would provide callers an
12 opportunity to affirmatively request interpretation services. Such a prompt is not unique – in fact,
13 many companies, including other utilities in Pennsylvania, do exactly this.⁴

14 This small change can hardly be described as "burdensome" or "insulting to the great
15 majority of the Company's customers," as Ms. Rossi asserted in her rebuttal testimony. (UGI St.
16 12-R, at 40). In response to Interrogatories, Mr. Stoyko expanded upon Ms. Rossi's assertion
17 that English-speaking customers complain about Spanish language messages and literature:

18 It has been my experience that UGI receives complaints from English speaking customers
19 regarding the company's use of bi-lingual scripts presented via on hold messages and

² This information was learned by calling UGI's customer service line, 800-276-2722.

³ As I noted in my direct testimony, Spanish is the dominate language spoken by LEP individuals within UGI's service territory. If UGI's census data showed significant populations speaking other languages, I would recommend similar prompts in those languages.

⁴ When contacting PECO's customer service line, 800-494-4000, the automated system welcomes callers, and provides an option for Spanish before any other options are given: "Welcome to PECO. Para Espanol, marque ocho" which translates to "For Spanish, press 8." PECO's system then goes on to provide similar prompts to the ones UGI currently has on its automated call center greeting.

1 literature. Additionally, we would be prompting 98.7% of our callers to answer an
2 unnecessary question.⁵

3 Mr. Stoyko does not justify his assertion that English speakers complain about messaging in
4 Spanish by presenting any data. Mr. Stoyko points out that 98.7% of callers will not need a
5 language prompt. Having an automated prompt will cause them no harm because they can
6 simply skip it. Rather than posing a burden, the addition of a Spanish language prompt to
7 identify those in need of interpretation services would help to remove language access barriers
8 for many of its LEP customers.

9 **Q: Can you summarize UGI's identification requirements to establish service?**

10 A: In my direct testimony, I recommended UGI accept alternative documentation from
11 applicants for service, including foreign documents and passports, rather than only accepting
12 social security numbers and state-issued identification, as UGI indicated was the policy in
13 response to discovery requests. (CAUSE-PA St. 2 at page 13; CAUSE-PA St. 2 Appendix B). In
14 response, Ms. Rossi states in her testimony that the Company does accept "alternative forms of
15 identification to establish service," and attaches a training document which lists acceptable forms
16 of identification. (UGI St. 12-R page 41, lines 18-21; UGI Gas Exhibit CAR-7). UGI's internal
17 policy documents seem inconsistent, and suggest that UGI call center employees are not aware
18 of or appropriately trained to accept alternative identification from callers requesting to establish
19 service.

20 **Q: Can you describe the Acceptable ID training document?**

21 A: Yes. Apparently, in certain cases, UGI requires two forms of ID. The primary form of ID
22 must be "state/government issued identification with a photograph." (UGI Gas Exhibit CAR-7).

⁵ UGI Response to CAUSE-PA-VII-1(b), attached hereto as Appendix B.

1 The options listed include a Driver's License from the U.S. or Canada, a U.S. Passport, a
2 Military ID card, or an ID card. Acceptable secondary forms of ID include a Social Security
3 Card, a Voter Registration Card, a U.S. Military Card, a Birth Certificate, a Permanent Resident
4 Card, a Native American Tribal Card, or an ITIN (Individual Taxpayer Identification Number).

5 **Q: In your opinion, are these sufficient options for alternate forms of documentation?**

6 A: No. For all the reasons stated in my Direct Testimony, I continue to be concerned about
7 UGI's ID policy and practices, all the more so given the training document referenced by Ms.
8 Rossi. With the exception of a Canadian driver's license, UGI's Acceptable ID policy does not
9 include any foreign ID. To the extent it requires a picture ID, UGI should broaden its list of
10 acceptable IDs to include foreign documents and foreign passports from any nation. To only
11 allow United States and Canadian documents and not documents and passports from other
12 nations is inappropriate and potentially discriminatory, as it preferences one nationality over
13 others.

14 **Q: Do you have any other suggestions regarding UGI's Acceptable ID policy?**

15 A: Yes. I have reviewed UGI Gas Exhibit CAR-7, and am attaching a redline of that
16 document to this testimony as Attachment A. My suggested revisions would improve both
17 training of UGI call center employees and the ability of UGI's immigrant customers to access
18 service.

19 **Q: Does this conclude your testimony?**

20 A: Yes.

UGI Gas Exhibit CAR-7

Acceptable ID

When it has been determined ID is necessary, we require two forms of ID. We can not hold an order or advise an applicant that a copy of the SS card is required in order to gain service. Acceptable forms of ID are:

1st Form of ID **must be State/Government issued identification (from any governmental entity, including federal, state, or local government identification from foreign governments) with a photograph**, such as:

- Drivers License (~~U.S. or Canada~~ any nation)
- ~~U.S.~~ Passport (any nation)
- Military ID Card (any nation)
- ID cards issued by Federal, State, or Local Government

from any nation

- -2nd Form of ID can be:
- Social Security Card
- Voter Registration Card
- ~~U.S.~~ Military Card
- ~~Birth Certificate~~ Birth certificate (any nation)
- U.S Citizen ID Card/Permanent Resident Card
- Native American Tribal Card
- ITIN (Individual Taxpayer Identification Number)
- Any other photo identification issued by Federal, State or Local Government of any nation

Any other form of ID you feel may qualify must be reviewed by a Sr. Rep or Supervisor before release.

Please note that all forms of ID must be valid (date may not be expired).

If an applicant does not have a Social Security Number or will not give us a SSN, we require proof of identification, including a picture. Proof could include a driver's license, student ID, visa, green card, tax ID number and any of the above accepted forms. It is important to ensure the ID provided clears up any questions as to why the Experian Match Code first flagged the connect check (did not pass). Refer to your Red Flag Policy if the Experian Code warrants escalation.

If the applicant refuses to provide ANY identification, UGI will not provide service to the applicant.

Please contact your supervisor if you have any questions regarding this policy.

CAUSE-PA-VII-1 (Prepared by Robert Stoyko)

Please refer to UGI Statement 12-R, at page 40, lines 13-18.

(a) What factors or signals do call center employees assess when determining "in the first few seconds of a call" whether a caller needs interpreter services?

(b) Please explain how a prompt at the start of a call asking whether a caller needs language assistance is burdensome and/or insulting to the caller.

(c) Identify and provide a copy of any studies, surveys, or other assessments conducted by Ms. Rossi, UGI, or third party to determine the impact of asking customers about their language needs at the start of a call.

Response:

a. Our Contact Center Representatives (CCR) begin every call with "Thank you for calling UGI, this is Chris speaking. How may I help you?" If the caller begins to respond in another language, or if the caller is difficult to understand due to a language barrier, the CCR will ask for consent to connect to a translator.

b. It has been my experience that UGI receives complaints from English speaking customers regarding the company's use of bi-lingual scripts presented via on hold messages and literature. Additionally, we would be prompting 98.7% of our callers to answer an unnecessary question.

c. The Company has not conducted such a survey.

No Digital Attachments Found.

8/2/16 ALG-R

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al., :

:

v. :

Docket No. R-2015-2518438

:

UGI Utilities, Inc. – Gas Division :

:

DIRECT TESTIMONY OF

JUDITH LEWIS, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

April 12, 2016

1 **PREPARED DIRECT TESTIMONY OF JUDITH LEWIS, ESQ.**

2 **Q: Please state your name, occupation and business address.**

3 A: Judith Lewis, Esquire. I am the Legal Director of the Barbara J. Hart Justice Center
4 *(Justice Center), a project of the Women's Resource Center (WRC). The Justice Center is*
5 located at 608 Jefferson Avenue, Scranton, PA 18510. My resume is attached hereto as
6 Appendix A.

7 **Q: Briefly outline your education and professional background.**

8 A: I received my JD from the University of Maine School of Law in 2007; and have a
9 Bachelors of Art in Psychology with a concentration in Gender Studies from Davidson College.
10 My professional background includes: Legal Director of the Women's Resource Center;
11 Assistant District Attorney for the New York County District Attorney's Office, Victim/Witness
12 Advocate; Educational Technician; and Team Leader/Youth and Community Outreach
13 Coordinator. Currently, I am also adjunct faculty for the National Child Custody Project
14 (Battered Women's Justice Project), co-leader for WRC's Building Partnerships for Economic
15 Justice Project; and a member of the Lackawanna and Susquehanna Counties Domestic Violence
16 Coalitions and Lackawanna County's Criminal Justice Advisory Board. I have also presented at
17 national, statewide and local conferences on topics such as The Intersection of Domestic
18 Violence and Housing Discrimination; Defining and Addressing Economic Abuse; Protection
19 from Abuse Act; Pennsylvania Custody Law; and WRC's Economic Justice Program.

20 **Q: Please describe the focus of your work.**

21 A: As Legal Director of the Justice Center I manage and operate the Justice Center including
22 supervising all Justice Center staff, grant writing and reporting and providing direct

1 representation to survivors of domestic and sexual violence on various civil legal matters. The
2 Justice Center provides free legal representation to low-income (235% and below federal poverty
3 guidelines) survivors of domestic and sexual violence in civil legal matters such as custody,
4 divorce, support, protection matters, housing, consumer debt, and immigration. Recognizing that
5 housing and economic stability are the primary factors to a survivor remaining free from
6 violence, the Justice Center strives to address these issues in court proceedings.

7 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

8 A: No.

9 **Q: For whom are you testifying in this proceeding?**

10 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
11 Efficiency in Pennsylvania ("CAUSE-PA").

12 **Q: What is the purpose of your testimony?**

13 A: To my understanding, CAUSE-PA intervened in this proceeding to ensure that UGI
14 Utilities Inc., Gas Division (hereinafter UGI, UGI Gas, or the Company) proposed rate increase
15 and its policies and procedures will not adversely impact the ability of UGI's low-income
16 customers to connect to, maintain, and afford natural gas service, which is essential for home
17 heating, water heating, and cooking.

18 While other issues will be addressed by CAUSE-PA's other two witnesses, my
19 testimony addresses the impact of UGI's practices, policies, and procedures which impact the
20 ability of domestic violence victims to access safe, stable, and affordable utility services. I will
21 make recommendations for how UGI should improve its practices and procedures to ensure that
22 this vulnerable population is able to access and maintain utility service.

1 **Q: Is domestic violence a widespread issue in UGI's service territory?**

2 A: Domestic violence is pervasive in every corner of the nation regardless of race, class,
3 religion, age, or national origin. Various data points on the national, state, and local level can
4 help illustrate the extent of domestic violence in the region.

5 First, the Center for Disease Control and Prevention's *National Intimate Partner and*
6 *Sexual Violence Survey* estimates that "1 in 3 women and 1 in 4 men have experienced rape,
7 physical violence, and/or stalking by an intimate partner in their lifetime."¹ In addition,
8 according to the National Network to End Domestic Violence (NNEDV)'s *2014 National Census*
9 *of Domestic Violence Services*, 2,498 victims were served by domestic violence programs on a
10 single day in Pennsylvania in 2014.²

11 Yet another way to measure the prevalence of domestic violence in Pennsylvania is to
12 consider the number of civil Protection From Abuse Orders (PFAs) that are entered by
13 Pennsylvania courts through UGI's service area. The Administrative Office of Pennsylvania
14 Courts (AOPC) reports the number of Protection From Abuse Orders (PFAs) issued in a given
15 county.³ According to the AOPC, approximately 9,170 Temporary Protection From Abuse
16 Orders (PFAs) and 4,226 Final Protection From Abuse Orders were issued in 2014 in the
17 counties that UGI serves.⁴ While the number of PFAs in a county provides a starting point for

¹ Ctrs. for Disease Control & Prevention, *The National Intimate Partner and Sexual Violence Survey (NISVS), Executive Summary* (2011), available at <http://www.cdc.gov/violenceprevention/nisvs/>.

² Nat'l Network to End Domestic Violence, *2014 Domestic Violence Counts: Pennsylvania Summary* (2014), at <http://nnedv.org/downloads/Census/DVCounts2014/PA.pdf>.

³ 23 Pa. C.S. §§ 6101 – 6122.

⁴ Administrative Office of Pennsylvania Courts (AOPC), Research and Statistics: Protection From Abuse, <http://www.pacourts.us/news-and-statistics/research-and-statistics/protection-from-abuse>. See Appendix B, Table – Temporary and Final PFAs in UGI Service Territory.

1 measuring the problem, these numbers do not fully reflect the pervasiveness of domestic
2 violence in UGI's service territory.

3 Not all victims of domestic violence seek or obtain a PFA. Seeking assistance and taking
4 legal action heightens safety concerns for survivors, as the point of separation is the most
5 dangerous time for victims.⁵ Accessing relief through a PFA, therefore, might not be an option
6 for a victim because it is too dangerous. Other reasons that victims might not be able to access
7 relief through a PFA include fear of retribution from the abuser for seeking relief from the
8 courts; the inability to effect proper service on the abuser; social or religious stigmas which may
9 make a victim reluctant to seek protection from the court; or a victim who may not have the
10 advantage of legal counsel, may face hurdles addressing the legal standards for a PFA for the
11 abuse. In other words, court data establishes that, as a baseline, there are at least thousands of
12 Pennsylvania domestic violence – who reside in UGI's service territory – who were able to
13 obtain court ordered protection. There are countless others who are not reflected in these
14 numbers.

15 Despite these baseline numbers, UGI reports that just 69 accounts are marked with a PFA
16 indicator.⁶ As I will discuss below, comparing these numbers suggests that victims of domestic
17 violence may not be able to readily access the statutory and regulatory protections available to
18 victims of domestic violence in the Pennsylvania Consolidated Statutes and the Public Utility
19 Code.

⁵ See, e.g., Jacquelyn C. Campbell, et. al., *Risk Factors for Femicide in Abusive Relationships: Results From a Multisite Case Control Study*, 93 AM. J. OF PUBLIC HEALTH, (July 2003) (reporting there is a higher risk of femicide after separation); Walter DeKeserdy, McKenzie Rogness, and Martin D. Schwartz, *Separation/Divorce Sexual Assault: The Current State of Social Scientific Knowledge*, 9 AGGRESSION AND VIOLENT BEHAVIOR (2004) (“Note, too, that data generated by the redesigned National Crime Victimization Survey reveal that separated women were assaulted three times more often than divorced women and close to 25 times more than married women”; “...found that compared to co-residing couples, separation entails a six fold increase in homicide risk for women.”).

⁶ Appendix C (Response of UGI to CAUSE-PA II-14).

1 **Q: Is there a connection between domestic violence and poverty?**

2 A: Yes. Domestic violence occurs across every level of socio-economic status.
3 Nonetheless, domestic violence and poverty are also inextricably linked. Nearly half of all women
4 receiving public assistance benefits report physical abuse by an intimate partner, and up to 23%
5 report experiencing abuse within the last year.⁷ Domestic violence is also the leading cause of
6 homelessness for women and children.⁸ In my experience working with victims of domestic
7 violence, I have seen these basic poverty and domestic violence statistics play out first hand. While
8 our services are open to victims with income at or below 235% of the federal poverty level – which
9 is higher than the 150% FPL used by the PUC – our clients nearly always struggle to establish
10 economic security, particularly during the first few years after they separate from an abuser.

11 A basic understanding of the dynamics present in an abusive relationship helps to illustrate
12 why victims of domestic violence experience such high levels of poverty. Abusers use a range of
13 tactics to maintain power and control over their victim. In addition to physical abuse, abusers
14 often manipulate the victim's finances to further isolate them from supportive networks and
15 decrease the likelihood that they will escape. Common tactics I see abusers employ against their
16 victim include:

- 17 • denying access to and/or collecting the victim's paycheck;
- 18 • forbidding victims from working outside the home;

⁷ Eleanor Lyon, Nat'l Res. Ctr. on Domestic Violence, *Welfare and Domestic Violence Against Women: Lessons from Research* (2011), available at http://vawnet.org/advanced-search/print-document.php?doc_id=317&find_type=web_desc_NRCDDV.

⁸ Nat'l Law Ctr. Homelessness & Pov. & Nat'l Network to End Domestic Violence, *Lost Housing, Lost Safety: Survivors of Domestic Violence Experience Housing Denials and Evictions Across the Country* (2007), available at http://www.nlchp.org/content/pubs/NNEDV-NLCHP_Joint_Stories%20February_20072.pdf (citing U.S. Conference of Mayors/Sodexo Survey on Hunger and Homelessness (2005)).

- 1 • harassing victims or their coworkers, often prompting the victim to be fired;
- 2 • maxing out the victim's credit cards;
- 3 • refusing to give the victim money for food, rent, or medicine;
- 4 • causing disturbances at the victim's residence, often prompting eviction; and
- 5 • keeping victims from accessing shared financial accounts.

6 After a victim leaves an abuser, their financial instability and physical or financial harm
7 also increases. Victims often lose paid work time or are fired from their job due to frequent court
8 appearances or absences to care for injuries sustained from the abuse. Additionally, abusers
9 frequently refuse to pay child support or make inconsistent and/or late support payments. At the
10 same time, the risk of serious physical assault increases upon separation. Victims face the greatest
11 risk of physical harm and/or lethality after separation, when batterers go to great lengths to re-
12 establish power and control over their victims. In addition to physical assaults and stalking,
13 abusers regularly empty bank accounts, shut off utility services, interfere with housing, and cut off
14 joint lines of credit after the relationship ends. In many cases, the abuser's sabotage prevents the
15 victim from establishing economic independence from the abuser, which forces the victim to either
16 return to the abuser, seek emergency shelter, or face homelessness.⁹

17 **Q: Why is access to utility service important for a victim of domestic violence?**

18 Many domestic violence victims live at or below the poverty level as a direct and indirect
19 consequence of their abuse. As such, assistance in accessing utility service is incredibly important

⁹ A 2003 study in Minnesota revealed that 46% of homeless women reported having stayed in an abusive relationship in the past because they had nowhere to go. Wilder Research Center, *Homeless in Minnesota 2003*, at 22 (Feb. 2004).

1 – especially at the time of separation from an abuser, when the victim is most likely to be in
2 transition and in need of new utility service.

3 As discussed above, victims regularly experience a period of dangerous and unstable
4 transition when they escape an abusive home, often fleeing the abuse with nothing but the
5 clothes on their back. In addition to domestic violence, lack of access to utility service is also a
6 leading cause of homelessness for families with children.¹⁰ The fact that domestic violence and
7 access to utility services are two leading causes of homelessness is not a coincidence, but rather
8 illustrates why ease of access to utility services is so critical for victims of domestic violence.
9 Indeed, the correlation between domestic violence, access to utility service, and homelessness is
10 cyclical, and can trap victims of domestic violence – forcing them to make an impossible choice
11 between returning to an abusive home or becoming homeless.

12 Before a victim can establish themselves and their children in a safe, affordable home, they
13 must be able to establish a connection to utility service. Many barriers, however, regularly impede
14 a victim's ability to seamlessly connect to utility service including debts remaining from utility
15 service at a shared residence, upfront payment requirements, security deposits, and unaffordable
16 rates. Utility debt, for example, weighs heavily in public housing determinations,¹¹ and is often
17 used as a reason to deny applications for public housing assistance. The Women's Resource Center
18 regularly assists victims whose applications for public housing are denied based on prior utility

¹⁰ See Colorado Division of Housing & Colorado Interagency Council on Homelessness, *Colorado Statewide Homeless Count* (Feb. 2007), <http://www.ucdenver.edu/academics/colleges/SPA/researchandoutreach/Buechner%20Institute%20for%20Governance/Centers/CEPA/Publications/Documents/HomelessExecutive%20Summary-FINAL-2-27-07.pdf>.

¹¹ See Dep't of Housing and Urban Development (HUD), Public Housing Occupancy Guidebook, at 4.6, (citing 24 CFR § 960.203(c)(1)), available at http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/rhiip/phguidebook:

1 debts. But unfortunately, without an address, utility and state-run assistance programs are
2 unavailable, leaving victims in a Catch-22: they cannot obtain housing until they resolve their
3 utility debt, but they cannot resolve their utility debt until they establish a new residence and
4 become a utility customer.

5 **Q: What specific utility protections are available to victims of domestic violence that**
6 **help break the cycle you describe?**

7 A: In recognition of the unique and harmful barriers for victims of domestic violence in
8 accessing utility services, which I summarized above, the General Assembly exempted victims
9 of domestic violence from the billing and collections standards contained in Chapter 14 of Title
10 66 of the Pennsylvania Consolidated Statutes.¹² In turn, this vulnerable customer segment is
11 exempt from the general billing, collection and termination standards contained in Chapter 56,
12 subchapters A-K, of the Pennsylvania Code.

13 Instead, victims of domestic violence with a PFA or “a court order ... which provides
14 clear evidence of domestic violence against the applicant or customer” are subject to the former
15 Chapter 56, Title 52 regulations contained in the Pennsylvania Code –codified in subsections L-
16 V of the Chapter.¹³ These separate regulations provide significant protection for victims of
17 domestic violence and work to alleviate many common barriers victims face when attempting to
18 connect to utility service after leaving an abusive home. The following summarizes the pertinent
19 protections:

¹² 66 Pa. C.S. § 1417.

¹³ Id.; 52 Pa. Code §§ 56.251 to 56.461 (subchapters L-V).

- 1 • 52 Pa. Code § 56.285
- 2 ○ Service cannot be denied based on utility arrears accrued in someone else’s name.
- 3
- 4 ▪ “A utility may not require, as a condition of furnishing of residential
- 5 service, payment for residential service previously furnished under an
- 6 account in the name of a person other than the applicant unless a court,
- 7 district justice, or administrative agency has determined that the applicant
- 8 is legally obligated to pay for the service previously furnished.”
- 9
- 10 ○ Access to extended payment arrangements based on individualized circumstances.
- 11
- 12 ▪ “An outstanding residential account with the utility may be amortized over
- 13 a reasonable period of time. Factors to be taken into account include the
- 14 size of the unpaid balance, the ability of the applicant to pay, the payment
- 15 history of the applicant and the length of time over which the bill
- 16 accumulated.”
- 17
- 18 • 52 Pa. Code § 56.323
- 19
- 20 ○ No termination for debt accrued in someone else’s name.
- 21
- 22 ▪ “Unless expressly and specifically authorized by the Commission, service
- 23 may not be terminated nor will a termination notice be sent for any of the
- 24 following reasons:
- 25 ...
- 26 (8) Nonpayment for residential service already furnished in the names of
- 27 persons other than the customer unless a court, district justice or
- 28 administrative agency has determined that the customer is legally
- 29 obligated to pay for the service previously furnished.”
- 30
- 31
- 32
- 33 • 52 Pa. Code § 56.334-.335
- 34
- 35 ○ Additional notice/ “personal contact” immediately preceding termination
- 36
- 37 ▪ “Immediately preceding the termination of service, a utility employee,
- 38 who may be the utility employee designated to perform the termination,
- 39 shall attempt to make personal contact with a responsible adult occupant at
- 40 the residence of the customer.”
- 41
- 42 ○ 48-hour stay and posted notice if no “personal contact” immediately preceding
- 43 termination.
- 44

- 1 ▪ “If a prior contact has not been made with a responsible adult occupant
2 either at the residence of the customer, as required under § 56.334 ... or at
3 the affected dwelling, the employee may not terminate service but shall
4 conspicuously post a termination notice at the residence of the customer at
5 the affected dwelling, advising that service will be disconnected not less
6 than 48 hours from the time and date of posting.”

7 **Q: Does UGI have policies and/or procedures in place to comply with the protections**
8 **for victims of domestic violence that you outlined above?**

9 A: Yes, in part. I have attached UGI’s policies for handling accounts with a PFA as CAUSE-
10 PA Exhibit 3-C, which UGI provided in response to interrogatories.¹⁴ However, UGI has not yet
11 adopted or implemented any policies or procedures for assisting victims of domestic violence
12 with other court orders that provide evidence of domestic violence against the applicant or
13 customer, as required by Chapter 14.¹⁵ The range of orders that may fall within this category is
14 broad – including anything from a child custody determination to a criminal charging or
15 sentencing order.

16 **Q: Apart from UGI’s lack of policies regarding other court orders with evidence of**
17 **domestic violence, are UGI’s policies and procedures adequate to provide access to the**
18 **utility protections available to victims of domestic violence with a PFA?**

19 A: No. UGI’s policy for handling a customer with a PFA inappropriately empowers
20 employees to interpret the content of a PFA, contains inherently incorrect assumptions about
21 PFA plaintiffs and defendants, does not accurately reflect the relief to which customers with a
22 PFA or other court order are entitled, and lack important confidentiality provisions to ensure that
23 a victim’s sensitive information is not disclosed.

¹⁴ Appendix C (Response of UGI to CAUSE-PA II-13 and attachments -1, -2, -3).

¹⁵ 66 Pa. C.S. § 1417 (amended effective December 22, 2014).

1 **Q: Please explain your concerns regarding UGI employees' interpretation of Protection**
2 **From Abuse Orders.**

3 **A: In relevant part, UGI's PFA policy provides the following:**

- 4 • "Prior to accepting a PFA, the PFA must be forwarded to the PFA team. They verify any
5 concerns with the legitimacy of the document."¹⁶
- 6 • "If a PFA is delivered to UGI, and it falls outside the scope of the standard Defendant is
7 husband, Plaintiff is wife, seek assistance of the PFA team or manager to verify the PFA
8 Rules apply."¹⁷
- 9 • "If we receive a PFA outside of the normal husband/wife scope, seek assistance from the
10 PFA team to verify if the PFA rules apply."¹⁸

11 There are several issues with UGI's reservation of discretion to its "PFA Team" to determine the
12 validity of a PFA, as well as the basic assumption embedded in its policy that a typical PFA
13 involves a heterosexual spousal relationship wherein the defendant is a husband and the plaintiff
14 is a wife.

15 First, reservation of judgment to a "PFA Team" regarding the "legitimacy" of a PFA is
16 problematic, as it places inappropriate discretion with employees to investigate the content of a
17 critically important court order.¹⁹ The content of the PFA has no bearing on the attachment of

¹⁶ Appendix C (Response of UGI to CAUSE-PA II-13 attachment II-13-1).

¹⁷ Appendix C (Response of UGI to CAUSE-PA II-13 attachment II-13-1).

¹⁸ Appendix C (Response of UGI to CAUSE-PA II-13 attachment II-13-3).

¹⁹ I am also troubled by the lack of training that the PFA Team has on domestic violence. In response to interrogatories, UGI explained:

The PFA Team consists of Contact Center Senior Representatives, Contact Center Supervisors and Contact Center Trainers. These team members handle call escalations and sensitive subjects, such as, but not limited to, PFA, bankruptcy, medical certification, and Red Flag Identity Theft inquiries.

Each member of the above teams are provided the PFA procedures. In addition, they are provided information from the company's Customer Service Manager, received from PCADV (Pennsylvania Coalition Against Domestic Violence), received on 9/25/2013 during an Energy Association of Pennsylvania meeting. This packet contained material that helped our team understand domestic violence and how utility service and billing can create barriers for victims.

See Appendix C (Response of UGI to CAUSE-PA III-4). Receipt of training materials from a session at a conference held over three years ago is not sufficient to understand domestic violence or the PFA process, which is a complex area of law even for a trained family law attorney.

1 protections for victims of domestic violence.²⁰ A PFA is signed by a judge – who has reviewed
2 the case and made a determination – and it is preposterous to suggest that the judge’s
3 determination be subject to a UGI employee’s review. Any dispute as to whether a PFA is
4 fraudulently submitted should go to the Commission to review, and should not be subject to the
5 discretion or review of a utility employee.

6 UGI’s policy cited above also makes an erroneous assertion that there is a “standard”
7 type of relationship for a PFA. By law, a PFA is available to anyone who is abused by a “family
8 or household member”, including “[s]pouses or persons who have been spouses, persons living
9 as spouses or who lived as spouses, parents and children, other persons related by consanguinity
10 or affinity, current or former sexual or intimate partners or persons who share biological
11 parenthood.”²¹ This definition has been held to include dating relationships, siblings,
12 stepparent/stepchild, grandparents/grandchildren, and many other relationships, which may not
13 fit within the stereotypical heterosexual spousal relationship. This definition is clearly much
14 broader than UGI’s PFA policy, which is limited to PFAs between a husband and wife – where
15 the wife is the plaintiff and the husband is the defendant.

16 UGI’s policy also appears to presume that the defendant in the PFA or other court order
17 will necessarily be the UGI account holder. The protections available to victims of domestic
18 violence are not so limited. For example, if a victim lives with an abuser and a third party, and
19 the third party has the account in their name. As the regulations provide, a victim with a PFA or

²⁰ Chapter 14 simply states that “[t]his chapter shall not apply to victims under a protection from abuse order as provided by 23 Pa. C.S. Ch. 61 (relating to protection from abuse). . . .” 66 Pa. C.S. §1417. There are no requirements for who the PFA must be against, the terms contained in the PFA, the timing of the PFA, or any other information that UGI may be looking for in determining the “legitimacy” of the document.

²¹ 23 Pa. C.S. § 6102 (definition of family or household member).

1 other court order is not responsible for bills accrued in someone else's name.²² Regardless of
2 who the account holder is, the victim should be released from liability if the account is not in the
3 victim's name. Otherwise, that victim would be faced with paying significant upfront charges to
4 connect to service at a new, safe location. There is no limitation on that applicability in the
5 regulations, and, in my opinion, placing such a limitation has the potential to harm victims of
6 domestic violence who are attempting to escape an abusive relationship.

7 Finally, UGI requires the PFA to have been "filed prior to being terminated for non-
8 payment" in order for the protections to apply.²³ Domestic violence is not the result of a single
9 episode – it is a pattern of coercion and control which often escalates over time. As I explained
10 before, the process of leaving an abusive home is often the most dangerous for the victim, and it
11 may be dangerous for them to obtain a PFA before a utility termination. Regardless of when the
12 PFA is issued, the protections available to a PFA holder should apply.

13 **Q: You also noted above that you are concerned UGI is not providing appropriate**
14 **relief for customers with a PFA. Can you please explain?**

15 **A:** In general, UGI's policies with regards to victims of domestic violence are vague, and do
16 not contain any clear statement of the relief available to victims of domestic violence that I
17 outlined above. UGI's policy sets forth a series of hypotheticals - some of which are
18 discriminatory and misleading, and others which simply do not appear to line up with the
19 regulatory requirements. In my opinion, UGI should explain or define the applicable statute and
20 regulations, and then outline the process and procedure to ensure full compliance.

²² 52 Pa. Code § 56.285 (utilities cannot deny service to an applicant based on arrears "in the name of a person other than the applicant."); 52 Pa. Code § 56.323 (utilities cannot terminate service for arrears accrued "in the name of persons other than the customer.")

²³ Appendix C (Response of UGI to CAUSE-PA II-13 Attachment II-13-1).

1 To begin, UGI's policies dictate that when a victim of domestic violence reports having a
2 PFA to UGI, UGI holds the victim responsible for any balance accrued with an abuser:

3 If the 2nd name line party calls to advise they have a PFA against the 1st
4 name line, issue the COC. Make sure you advise the 2nd name line that the
5 balance will be transferred to their new account.²⁴
6

7 If both the plaintiff and defendant are listed on the utility account the
8 balance may be transferred to the plaintiff's name only.²⁵

9 In addition to being vague and imprecise, these hypotheticals appear to also be
10 discriminatory against victims of domestic violence, and serve to undermine the intent of
11 providing additional protection to victims of domestic violence by holding victims solely liable
12 for debt accrued while they were living in an abusive home. I understand, on advice of counsel,
13 that a victim is not exempt from responsibility for a utility bill if they are named as a primary
14 account holder.²⁶ But UGI's hypothetical does not indicate that the abuser can also be held
15 accountable for the bill, given that the bill in UGI's hypothetical was accrued in both names. At
16 the time of separation, victims of domestic violence struggle to establish economic stability as
17 they navigate complex civil and criminal legal systems, such as criminal complaints, custody,
18 and divorce proceedings, while simultaneously relocating, starting new employment, and/or
19 recovering from the physical and emotional injuries sustained by the abuser. Given this extreme
20 level of hardship many victims face, it is simply outrageous that UGI has a written policy to hold
21 victims of domestic violence solely responsible for a debt accrued in both the victim and the
22 abuser's name.

²⁴ Appendix C (Response of UGI to CAUSE-PA II-13, Attachment II-13-1).

²⁵ Appendix C (Response of UGI to CAUSE-PA II-13, Attachment II-13-3).

²⁶ On advice of counsel, I understand that a victim of domestic violence with a PFA or other court order may be held responsible for bill accrued in their name. See 52 Pa. Code §§ 56.285, .323.

1 Likewise, it is unclear why UGI would issue a change of customer (COC) request in its
2 above hypothetical, given the hypothetical caller merely identified that they had a PFA – not that
3 they requested to be the sole named party on the bill. In many cases, a victim may be relocating
4 and requesting to be removed from the account, not requesting to be the solely named account
5 holder. This lack of clarity can be found throughout UGI’s policy, and results in confusion at all
6 employee levels when handling a call from a customer with a PFA or other court order – thereby
7 adding to the stress, time, and complication that a victim must face in attempting to make simple
8 requests regarding their account.

9 In addition to the vague and discriminatory general policies, UGI’s PFA Payment
10 Arrangement Guidelines provide a rigid chart for payment arrangements based on income and
11 the number of broken payment arrangements.²⁷ This chart lacks a necessary and appropriate
12 level of flexibility for victims of domestic violence. As I noted above, a victim of domestic
13 violence with a PFA or other court order is entitled to have their debt “amortized over a
14 reasonable period of time.”²⁸ In determining what is reasonable, utilities are instructed through
15 regulation to take into account “the size of the unpaid balance, the ability of the applicant to pay,
16 the payment history of the applicant and the length of time over which the bill accumulated.”²⁹
17 Again, victims of domestic violence are particularly vulnerable after separation, when a PFA or
18 other order is most often sought and issued. During this tumultuous time, when their physical
19 safety is most at risk, victims struggle to establish economic independence from an abuser.
20 Economic instability during this sensitive transition can force a victim to make an impossible
21 choice between homelessness and returning to an abusive home. In recognition of this fact,

²⁷ Appendix C (Response of UGI to CAUSE-PA II-13, Attachment II-13-2).

²⁸ 52 Pa. Code § 56.285.

²⁹ 52 Pa. Code § 56.285.

1 victims of domestic violence are given the right to a flexible and individualized payment
2 arrangement that account for their unique circumstances to ensure that the victim can stay
3 connected to service over the long term. UGI's policy simply does not provide the level of
4 flexibility needed to adequately accommodate this extremely vulnerable population.

5 Even more troubling than UGI's unduly strict and inappropriately vague policies
6 discussed above, however, is the absence of any explanation of a critically important right for
7 victims: the right to be held harmless for debts accrued in someone else's name. This is an
8 important right, though it is often improperly implemented. Clear policies are needed to ensure
9 that the right is properly implemented and accessible to those who need the protection.

10 **Q: You also mentioned above that you are concerned with UGI's confidentiality**
11 **policies – or lack thereof. Could you please explain?**

12 **A:** PFAs and other court orders with evidence of domestic violence are uniquely personal,
13 and often contain extensive details about the abuse a victim suffered. I understand through
14 counsel that UGI is subject to basic confidentiality regulations; however, the information that a
15 utility typically collects about an individual pales in comparison to the personal information
16 contained in a PFA or other court order with evidence of domestic violence. I believe that rather
17 than collect a copy of a customer's PFA or other order, UGI should only note the customer's
18 account with the docketing information from the order and the jurisdiction where the order was
19 issued. This would allow UGI to track the existence of an order without placing the information
20 contained therein at risk of unnecessary and possibly harmful disclosure.

1 **Q: Do you have any recommendations for how UGI can improve its policies with**
2 **regard to victims of domestic violence?**

3 A: Yes. I recommend that UGI extensively revise its policies and procedures with respect
4 to victims of domestic violence with a PFA or other court order. Specifically, the following
5 aspects of UGI's policy should be clarified:

- 6 • Anyone who submits a PFA listing them as a Plaintiff should be granted the additional
7 protections available to them pursuant to Chapters 14 and 56.
- 8 • All applicants and customers should be advised of the availability of protections if they
9 have a PFA, and asked to provide a copy of the PFA to UGI to enable those protections
10 to be properly implemented.
- 11 • If there is a question about whether a PFA is genuine, UGI should apply the protections
12 and seek review by the PUC.
- 13 • Debt accrued in a name other than the Plaintiff /customer should never be assigned to the
14 Plaintiff.
- 15 • If a balance was accrued in the Plaintiff and a third party's name, the third party should
16 be assigned the debt. If there is a dispute by the third party, only then should the Plaintiff
17 be pursued for the balance.
- 18 • Payment arrangements should be granted for a reasonable period of time, taking into
19 account each of the factors listed in the regulations.
- 20 • When a PFA is submitted, a notation should be made in the account and UGI's copy of
21 the order should be shredded to avoid any unintended breach in the confidentiality of this
22 sensitive court document.

1 In making its revisions, UGI should seek advice and input from all interested
2 stakeholders, including local domestic violence service providers within its service territory and
3 the Pennsylvania Coalition Against Domestic Violence. In addition, UGI should provide
4 extensive training for its current staff – particularly its “PFA Team” – and should implement
5 policies to ensure that domestic violence is included in new hire and refresher trainings. Again,
6 UGI should partner with experts at local domestic violence programs and the Pennsylvania
7 Coalition Against Domestic Violence to consult on and/or conduct these trainings.

8 **Q: Does this conclude your Direct Testimony?**

9 **A: Yes.**

JUDITH LEWIS

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EMPLOYMENT HISTORY

Women's Resource Center, Scranton, Pennsylvania 2/2011-Present
Legal Director

Manage legal office that provides civil legal representation to survivors of domestic violence, sexual assault, dating violence and stalking. Participate in program development, performance evaluations of staff, and hiring and training of staff. Supervise staff of three. Evaluate and analyze civil cases, namely family law cases, and explain legal options to survivors. Engage in survivor-centered advocacy. Conduct interviews and hearings. Interpret and apply laws, court decisions and legal authorities for use in preparation of cases, motions and briefs. Negotiate agreements with opposing parties. Handle appeals, including oral arguments. Write grants and complete grant reports for federal and state funding and private foundation. Participate in local and state wide committees including the Lackawanna and Susquehanna County Domestic Violence Coalitions and Criminal Justice Advisory Board. Conduct trainings at the local, statewide and national levels on legal issues pertinent to survivors of domestic violence and sexual assault. Adjunct faculty for the National Child Custody Project (Battered Women's Justice Project). Co-wrote application for Center for Survivor Agency and Justice's Building Partnerships for Economic Justice, resulting in the organization being selected as one of four national projects to be a demonstration site for the project.

New York County District Attorney's Office, New York, New York 9/2007-2/2011
Assistant District Attorney

Evaluate and analyze felonies and misdemeanors to make charging decisions and to determine whether further investigation and evidence is required. Interview and advise police officers, victims, and witnesses in regards to prospective criminal complaints, criminal procedure, and court proceedings. Present cases to Grand Jury, conduct hearings and try cases. Interpret and apply laws, court decisions and legal authorities for use in preparation of cases, motions and briefs. Negotiate plea agreements with opposing counsel.

York County Victim/Witness Advocate Program, York County, Maine 2/2002-8/2004
Victim Witness Advocate

Advocated for victims and witnesses of crimes. Explained criminal charges, court procedures, and plea offers. Assisted victims in preparing victim impact statements, completing Victim Compensation forms, and testifying in court. Provided referrals when appropriate. Worked collaboratively with attorneys, judges, police officers, and social services. Chairperson of state-wide Victim Advocate Association.

Portland Public School District, Portland, Maine 9/2000-2/2002
Educational Technician

Taught reading to elementary age youth who were reading below grade level. Created lessons plans and planned and facilitated reading groups using independent judgment, and creativity.

People's Regional Opportunity Program, Portland, Maine 12/1997-8/1999
Team Leader (August 1998-August 1999).

Planned and conducted weekly team meetings with Youth and Community Outreach Coordinators in two Portland Public Housing Neighborhoods. Participated in program and curriculum development, performance evaluations of Coordinators, and hiring and training of staff. Served on the agency wide Regional Team Committee.

Youth and Community Outreach Coordinator (December 1997-August 1999).

Planned, coordinated, and evaluated gender specific girls groups and co-ed groups (ages 6-16) in Portland Public Housing Neighborhoods. Trained youth in peer bonding, personal health and responsibility, self-esteem, violence and oppression, and community activism. Collaborated with schools, families, and social service agencies.

YWCA Crisis Service, Manchester, New Hampshire
Education Coordinator

3/1997-9/1997

Nashua Children's Association, Nashua, New Hampshire
Shift Supervisor, Individual Counselor, Residential Counselor

11/1995-3/1997

EDUCATION

J.D., University of Maine School of Law

Portland Maine, May 2007

Graduated Cum Laude

Honors:

- Faculty Significant Achievement Award for Academic Excellence & Significant contributions to the Law School
- The Outstanding Scholastic Achievement Award in the Area of Criminal Law & Procedure
- Student Bar Association Award
- Certificate of Recognition for Work in the Pro Bono Legal Services Program
- Recipient: Kenneth Clegg Memorial Writing Contest

Certificate in Photography

SALT Institute for Documentary Field Studies

Portland Maine, Spring 2000

The Maine Photographic Workshops, Resident Program

Rockport, Maine, Fall 1999

B.A. in Psychology, and Concentration in Gender Studies, Davidson College

Charlotte North Carolina, 1995

Graduated Cum Laude

BAR ADMISSIONS

New York, 2007 [(status: retired)]

Pennsylvania, 2010

TABLE – Temporary and Final PFAs in UGI Service Territory

	Temporary PFAs Issued	Final PFAs Issued
Luzerne County	1,283	716
Carbon County	249	107
Monroe County	551	261
Schuylkill County	361	166
Northampton County	753	409
Montgomery County	1,239	463
Lehigh County	1,017	467
Berks County	1,166	444
Lancaster County	953	331
Lebanon County	189	110
Dauphin County	736	322
Cumberland County	229	154
Adams County	34	35
York County	410	241
TOTAL	9,170	4,226

*Final PFAs include those ordered after a final hearing and those ordered pursuant to a stipulation or agreement between the parties.

*Compiled from data made available by the Administrative Office of Pennsylvania Courts (AOPC), Research and Statistics: Protection From Abuse, <http://www.pacourts.us/news-and-statistics/research-and-statistics/protection-from-abuse>.

CAUSE-PA Statement 3, Appendix C

Interrogatory Responses of UGI

Response of UGI to CAUSE-PA II-2..... Appendix C-1
Response of UGI to CAUSE-PA II-13..... Appendix C-2
Response of UGI to CAUSE-PA II-14..... Appendix C-3
Response of UGI to CAUSE-PA III-4 Appendix C-4

Response of UGI to CAUSE-PA II-2

Question 2 (Prepared by Robert Stoyko)

Please provide a list of all call center employee trainings conducted in the last five years, the date and location the trainings were conducted, and the time allotted for each training. Include a detailed agenda for each training and a summary of the substantive topics covered, and indicate whether the training was mandatory for all or some call center employees.

Response:

Upon consultation with CAUSE-PA, the company is providing a response for Calendar Year 2015.

Please see Attachments CAUSE-PA II-2-1 and CAUSE-PA II-2-2.

Attachment File Name	Attachment Note
CAUSE-PA II-2-1.pdf	
CAUSE-PA II-2-2.pdf	

Event	Training Date	Training Type	Anticipated Training Dates	Anticipated Time	Anticipation	Voluntary or Mandatory	Training Description	Topics Covered	Training Location
3	6-27 through 6-28	Blind Training	9:00am-4pm	6 hours each	2	M	Blind Training required as part of Phase 1 of Initial Training, generally to occur after C111 completion Phase 1 of New Hire Training.	See Agenda for Blind Training	William Bayne
4	7-Aug	Customer Ac. Course	9:00am	90 mins	1	M	Training was held for 1 session in April 2011. The rest of the Customer Ac. Course will be held from training in the 2nd half of 2012.	Changes related to POC Chapter 14 Changes	Training
8	7-Aug	Landscape Training	9:00am	1 hour	1	F	Landscape training of the request of POC's to participate and the landscape in the 2nd half of the training. It is on this date. All new hires to attend this training.	Landscape System	Training
8	8-Jan	Emergency Behavior Training	9:00am	1.5 hours	2	M	Completed as requested by request of POC's regarding behavior.	See Emergency Behavior	Training
9	11-Jan	Initial Training Supervisor	9:00am	4 hours	1	M	Requested by the C111 supervisor.	Reviewed paper from Agency for New Hire Training that CCR has approved for use.	
10	12-Jan through 2-Feb	New Hire Initial Training	9:00am - 5:00pm daily	8 hours	4	M	Initial Training required for New Hire entering the call center.	See Agenda for New Hire Training	
7	14-Jan	Unfired Training	9:00am	3 hours	1	M	Requested by the C111 supervisor for the new hire training.	Unfired Procedures Document	William Bayne
8	15-Jan	Behavior	9:00am	2 hours	1	M	Requested by the C111 supervisor.	ABC Budget Program & Safety Disputes	William Bayne
9	16-Jan	Behavior	9:00am	2 hours	1	M	Behavior training.	4-1000 Chapter 14 Changes & LMS/MS	William Bayne
10	18-Jan	Event Behavior	9:00am-4pm	6 hours each	1	M	Requested by the C111 supervisor.	Reviewed paper from Agency for New Hire Training that CCR has approved for use.	William Bayne
11	21-Jan								
11	22-Jan	Landscape Training	9:00am	1 hour	1	M	Landscape training for new hire.	Trained the landscape system to make sure it was working properly. For the night and to make sure that there are no other issues with the system.	William Bayne
13	22-Jan	Landscape Behavior Training	2PM	1.5 hours	1	F	Requested a supervisor at the landscape area at the 1:00 PM.	Landscape System	Training
14	23-Jan	Service Training	9:00am	2 hours	1	M	Service Training required as part of Phase 1 of Initial Training, generally to occur after C111 completion Phase 1 of New Hire Training.	See Agenda for Service Training	William Bayne
15	30-Jan	BOLAN/MS/MS Training	9:00am	2 hours	1	M	Requested training for C111/MS.	New BSLMS/MS/MS Procedures	William Bayne
16	3-Feb		9:00am - 1:00pm	2 hours	1	M			

Course	Training Date	Training Type	Scheduled Training Dates	Allocated Time	Attendees	Volunteers or Observers	Training Description	Topic Covered	Training Location
17	18 Feb	Compliance Procedure	9:30am & 2:30pm	30 mins	6	M	Our compliance procedure is set regularly to reflect changes in our regulatory environment. This training is for Compliance staff to ensure they are up to date on the latest regulatory changes and to ensure they are aware of the latest regulatory changes.	Compliance Procedure	Reading
18	19 Feb	Microsoft Migration Training	1:30pm & 2:30pm	30 mins	6	M	Training provided for staff who may be involved in the migration of Microsoft Office 365 to the new Microsoft 365 environment.	Microsoft Office 365 Migration	Reading
19	19 Feb	Leadership & Change Management	2:30pm	2 hours	1	M	Session for staff on 19 Feb.	Training on the Leadership Program and Change Management	Reading
20	24 Feb through 26 Feb - 8 hrs	Compliance Training	9:30am - 12:30pm	3 hours daily	2	M	Full day training provided for staff on 24 Feb, 25 Feb, and 26 Feb.	See Agenda for Compliance Training	Reading
21	25 Feb through 27 Feb	Compliance Training	9:30am - 12:30pm	3 hours daily	6	M	Compliance training provided for staff on 25 Feb, 26 Feb, and 27 Feb.	See Agenda for Compliance Training	Reading
22	4 Mar through 6 Mar	Compliance Training	9:30am - 12:30pm	3 hours daily	6	M	Compliance training provided for staff on 4 Mar, 5 Mar, and 6 Mar.	See Agenda for Compliance Training	Reading
23	5 Mar through 7 Mar	New Hire onboarding Training	9:30am - 12:30pm	3 hours daily	2	M	New Hire onboarding training provided for staff on 5 Mar, 6 Mar, and 7 Mar.	See Agenda for New Hire Training	Reading
24	9 Mar	Leadership Training	11:30am	30 mins	1	M	Session for staff on 9 Mar.	Leadership Training	Reading
25	10 Mar - 11 Mar	Service Training	9:30am - 12:30pm	3 hours daily	2	M	Service training provided for staff on 10 Mar and 11 Mar.	See Agenda for Service Training	Reading
26	18 Mar through 17 Mar - 16 hrs	Compliance Training	9:30am - 12:30pm	3 hours daily	6	M	Compliance training provided for staff on 18 Mar, 19 Mar, 20 Mar, 21 Mar, 22 Mar, 23 Mar, 24 Mar, 25 Mar, 26 Mar, and 27 Mar.	See Agenda for Compliance Training	Reading
27	19 Mar through 21 Mar	Compliance Training	9:30am - 12:30pm	3 hours daily	6	M	Compliance training provided for staff on 19 Mar, 20 Mar, and 21 Mar.	See Agenda for Compliance Training	Reading

Case#	Training Date	Training Type	Scheduled Training Times	Reflected Date	Apparatus	Firefighters or Mandatory	Training Description	Tasks Covered	Training Location
28	01 Mar	Dispatcher System Implementation (Single & a "DSC")	Mon, 7:45am - 9:45am & 3:30pm	01 Mar	All Billing normal C.F.F.	M	This training was mandatory for all of Call Center representatives as a result of "Training Plan" which was issued in the Billing Center. The Department's Billing Representative (BRI) will be supported by the Air Center and the Call Center in order to help them to understand the Billing System. This training was held on 01/03/2020.	Billing System Implementation (Single & a "DSC")	Belt Location
29	1 Apr		2:00pm						
30	7 Apr		2:30pm						
31	7-Apr through 9-Apr	Billing Training	9:30am - 5:30pm daily	9 hours daily	1	M	Billing Training required as part of Phase 1 of total training, generally 1 week after a C.F.F. completes Phase 1 of new hire training.	See Agency for Billing Training	Reading
32	7-Apr through 11-Apr	New Hire Initial Training	9:30am - 9:30pm daily	4 hours daily	1	M	Initial Training required for new hires entering the Call Center.	See Agency for New Hire Training	Wilson Berry
33	22-Apr - 23-Apr	Service Training	9:30am - 5:30pm daily	4 hours daily	2	M	Service Training required as part of Phase 1 of total training, generally 1 week after a C.F.F. completes Phase 1 of new hire training.	See Agency for Service Training	Reading
34	23-Apr	COB & DSC Training	7:00pm	1 1/2 hours	1	M	Part of Billing Training that was required for all C.F.F.s in the 4/23/20.	COB Training which includes how to fill the COB position, how to issue LAR, LARF and CFP/ARF and use DSC Procedures	
35	12-Apr	DCIM Training	9:00am	1 1/2 hours	1	M	Requested by Call Center Supervisor, from the Billing Center for one of our new hires.	DCIM training	
36	16-May through 20-May	New Hire Initial Training	9:30am - 5:30pm daily	4 hours daily	1	M	Initial Training required for new hires entering the Call Center.	See Agency for New Hire Training	Wilson Berry
37	21-Apr	Refresher	7:30am	1 hour	1	M	Requested by C.F.F. Supervisor.	Review on Billing Center LARF, LARF and DSC	Wilson Berry
38	16-Jun	Emergency Refresher	7am, 7:45am & 4:45pm	01 Jun	All employees within the Call Center. Employees who were assigned full-time as part of Billing Plan.	M	Emergency Refresher Training is held annually to the benefit of new or returning employees. The training covers the following topics: Billing, Customer Service, and Billing System. The training is held in the Call Center and is required for all employees. Training is required for all employees of the Call Center.	See Agency for Billing Training	Belt Location
39	17-Jun		7am & 4pm						
40	18-Jun		7:45am & 3pm						
41	19-Jun		3pm						
42	24-Jun		7am						
43	17-Jun through 18-Jun	Billing Training	9:30am - 5:30pm daily	4 hours daily	1	M	Billing Training required as part of Phase 1 of total training, generally 1 week after a C.F.F. completes Phase 1 of new hire training.	See Agency for Billing Training	Wilson Berry
44	15 July through 19-Jul	New Hire Initial Training	9:30am - 5:30pm daily	4 hours daily	1	M	Initial Training required for new hires entering the Call Center.	See Agency for New Hire Training	Wilson Berry

Case#	Training Date	Training Type	Scheduled Training Weeks	Approved Hours	Assignment	Validated by Mandatory	Training Description	Topic Covered	Training Method
45	14 Jul through 17 Jul	Online Training	0 900am - 3 30pm daily	4 hours daily	4	M	Self-paced training required as part of Phase 1 of online training, generally 90 minutes after ECR completion Phase 1 of New Hire Training	See Agenda for Self-paced Training	Blended
46	21 Jul through 24 Jul	Classroom Training	0 900am - 3 30pm daily	3 hours daily	1	M	Classroom Training required for New Hire Customer Care "M" New Hire Training	See Agenda for Credit Training	Virtual/Blended
47	21 Jul through 24 Aug	Self-paced Online Training	0 900am - 3 30pm daily	3 hours daily	1	M	Self-paced training required for New Hire "M" New Hire Training	See Agenda for New Hire Training	Blended
48	25 Jul	Classroom Training	0 900am - 3 30pm daily	1/2 hour	1	M	Blended training with ECR's who were off work on 25 Jul under the Online 2 Day Training and New Hire Training	Revised the program and classes need to get COE/CAT Program	Blended
49	26 Jul	Classroom Training	0 900am - 3 30pm daily	1/2 hour	1	M	Blended training with ECR's who were off work on 26 Jul under the Online 2 Day Training and New Hire Training	Revised the program and classes need to get COE/CAT Program	Blended
50	29 Jul	Employee Refresher Training	0 900am - 3 30pm daily	1 hour	1	M	Required for ECR's taking an extended leave from at least 30 days prior to return to work	See Agenda for Refresher Training	Blended
51	1 Aug through 28 Aug	Self-paced Online Training	0 900am - 3 30pm daily	4 hours daily	4	M	Self-paced training required for New Hire "M" New Hire Training	See Agenda for New Hire Training	Blended
52	1 Aug through 18 Aug	Classroom Training	0 900am - 3 30pm daily	4 hours daily	2	M	Classroom Training required for New Hire "M" New Hire Training	See Agenda for Credit Training	Blended
53	29 Aug	Online Refresher	0 900am - 3 30pm daily	2 hours	1	M	Required for ECR's taking an extended leave from at least 30 days prior to return to work	See Agenda for Self-paced Training	Virtual/Blended
54	1 Aug	Online Training	0 900am - 3 30pm daily	3 hours	1	M	Self-paced training required as part of Phase 1 of online training, generally 90 minutes after ECR completion Phase 1 of New Hire Training	See Agenda for Service Refresher	Blended
55	21 Aug	Classroom Training	0 900am - 3 30pm daily	1 hour	1	M	Classroom Training with ECR's who were off work on 21 Aug under the Online 2 Day Training and New Hire Training	Revised the program and classes need to get COE/CAT Program	Blended
56	23 Aug	Classroom Training	0 900am - 3 30pm daily	1 hour	1	M	Classroom Training with ECR's who were off work on 23 Aug under the Online 2 Day Training and New Hire Training	Revised the program and classes need to get COE/CAT Program	Blended
57	1 Aug	Online Training	0 900am - 3 30pm daily	3 hours	1	M	Self-paced training required as part of Phase 1 of online training, generally 90 minutes after ECR completion Phase 1 of New Hire Training	See Agenda for Service Refresher	Virtual/Blended
58	8 Aug	Online Training	0 900am - 3 30pm daily	3 hours	1	M	Self-paced training required as part of Phase 1 of online training, generally 90 minutes after ECR completion Phase 1 of New Hire Training	See Agenda for Service Refresher	Blended
59	15 Aug & 17 Aug through 18 Aug	Classroom Training	0 900am - 3 30pm daily	4 hours daily	2	M	Classroom Training required for New Hire "M" New Hire Training	See Agenda for Credit Training	Virtual/Blended
60	16 Aug	Online Training	0 900am - 3 30pm daily	4 hours	1	M	Self-paced training required as part of Phase 1 of online training, generally 90 minutes after ECR completion Phase 1 of New Hire Training	See Agenda for Service Refresher	Blended
61	16 Jul through 18 Jul	Self-paced Online Training	0 900am - 3 30pm daily	3 hours daily	1	M	Self-paced training required for New Hire "M" New Hire Training	See Agenda for New Hire Training	Blended
62	18 Aug	Classroom Training	0 900am - 3 30pm daily	1/2 hour	1	M	Classroom Training with ECR's who were off work on 18 Aug under the Online 2 Day Training and New Hire Training	Revised the program and classes need to get COE/CAT Program	Virtual/Blended
63	22 Aug	Online Refresher	0 900am - 3 30pm daily	2 hours	1	M	Required for ECR's taking an extended leave from at least 30 days prior to return to work	Revised the program and classes need to get COE/CAT Program	Blended

Class	Training Date	Training Topic	Scheduled Training Hours	Allocated Base	Attendance	Voluntary or Mandatory	Training Description	Notes Covered	Training Location
64	10/04/20 through 3 Oct	1 week Training	9 Hours daily	9 hours daily	1	M	1 week training required for Fire Callcenter List of Top Priorities. All Trainers required to attend this training.	See Agenda for Detail Training	Reading
65	1 Oct through 16 Oct	New Hire Initial Training	9 AM - 5 PM daily	9 hours daily	1	M	Initial Training required for New Hire attending the Call Center	See Agenda for New Hire Training	
66	8 Oct	LMSAP Training	11 AM - 12 PM	1.0 hour	1	M	All Trainers required to attend this training to complete the training of the subject of Callcenter 1 to the on-site Social Security Office.	Accounting & Services (SAS) as a Computer Assisted Request Credit Bureau	Virtual Bureau
67	9 Oct		9 AM - 10 AM	1.0 hour					
68	19 Oct through 22 Oct	MSL Training	8:30 AM - 5:00 PM daily	8 hours daily	19	M	All Trainers required to attend this training for the 19th of Oct in the Call Center	See Agenda for MSL Training	Pittsburgh
69	19 Oct through 19 Oct	New Hire Initial Training	9 AM - 5 PM daily	9 hours daily	1	M	Initial Training required for New Hire attending the Call Center	See Agenda for New Hire Training	Virtual Bureau
70	21 Oct	Credit Supervisor	None	1.0 hour	1	M	Completion of the request of all 111's requests for new materials requested with within the Credit Bureau	See Agenda for Credit Training	
71	23 Oct	SharePoint Training for Supervisors	1 Hour	1 hour	11	F	Voluntary training for Supervisors	Covered here in many other updates in the SharePoint "collaboration information" section page	Reading
72	24 Oct	Service Training	9:00 AM	1 hour	1	(2 Day Training)	Service Training required as part of Phase 1 of initial training generally complete after all 111's completion Phase 1 of New Hire Training	See Agenda for Service Training	
73	1 Sept through 23 Sept	New Hire Initial Training	9 AM - 5 PM daily	9 hours daily	1	M	Initial Training required for New Hire attending the Call Center	See Agenda for New Hire Training	Virtual Bureau
74	21 Sept through 23 Sept	MSL Training	8:30 AM	3 hours	11	M	All Trainers required to attend this training for the 21st of Sept in the Call Center	See Agenda for MSL Training	Pittsburgh
75	7 Oct	Service Training	9 AM	1 hour	1	(2 Day Training)	Service Training required as part of Phase 1 of initial training generally complete after all 111's completion Phase 1 of New Hire Training	See Agenda for Service Training	
76	17 Oct	Billing Training	9 AM	1 hour daily	1	M	Billing Training required as part of Phase 1 of initial training generally complete after all 111's completion Phase 1 of New Hire Training	See Agenda for Billing Training	Reading
77	18 Oct through 18 Oct								
78	18 Oct through 18 Oct								
79	1 Oct	LMSAP Training	9 AM	1 hour	1	M	All Trainers required to attend this training to complete the training of the subject of Callcenter 1 to the on-site Social Security Office.	Accounting & Services (SAS) as a Computer Assisted Request Credit Bureau	Virtual Bureau
80	1 Oct through 12 Oct 2016	New Hire Initial Training	9 AM - 5 PM daily	9 hours daily	1	M	Initial Training required for New Hire attending the Call Center	See Agenda for New Hire Training	
81	8 Oct through 12 Oct	Billing Training	9 AM - 5 PM daily	8 hours daily	1	M	Billing Training required as part of Phase 1 of initial training generally complete after all 111's completion Phase 1 of New Hire Training	See Agenda for Billing Training	Reading

Agenda for New Hire Training

- *Building Tour and Orientation*
- *Accessing, screens, codes, LETA, transactions*
- *Phone Courtesy*
- *Applications, Red Flag, Experian*
- *DOJM Manual: DATA screen, Turn-On's, COC's, Shut-Off's, Discontinuance, Demolitions, NBA and Meter Sets*
- *Security Deposits*
- *LFSO*
- *Autoscribe, KUBRA, Sample Bills,*
- *Special Programs*
- *Combined Billing*
- *Electric Emergencies, Power Outages and OMA (Outage Management System), Gas Emergencies*
- *Chapter 56: Definitions, Review, and Test*

Agenda for Service Training

- *UGI HVAC services*
- *Guidelines for issuing same day work, priorities*
- *Make Safe Appliance Procedure*
- *Hazardous Condition Procedure*
- *APLC and EMER Screen*
- *Pilot Light Flame Colors*
- *Partial Heat Calls*
- *Turn-On and Test-Out*
- *Gas Beyond the Main*
- *Regulator Vent Replacement*
- *Service line inspection program (SLIP)*
- *Construction and Maintenance*
- *Gas Flooding*
- *Environmental Calls*
- *Gas Light Procedure*
- *Claims and Field Complaints.*

Agenda for Credit Training

- Collections Process
- Credit Screens: KREV, KOLL, DARG, DILR/PAIS
- Residential Applications, Balance Transfer Policies, Non-Applicant/ Applicant disputes old balance, Third Party Notification
- Methods to Stop Termination: KISU, STAY, P/A
- Payment agreements, Updating income and occupants, Entering a P/A, P/A Bill messages, Documenting a P/A, SCINC & CII
- PFA'S, Medical Certifications
- Termination and credit related disputes
- Reconnection procedure, Cut-off for non-payment by street crew
- CWIP, Winter T/O policy
- Returned checks
- Landlord Tenant and Foreign load terminations, Tenant Rights, Health Care Facilities
- Commercial and Industrial Accounts
- Bankruptcy Accounts
- Shut off in Error
- Inactive accounts, Latitude, Returned Mail, Collection Agencies
- Credit Reference Letters
- Revenue Protection: Theft

Agenda for Billing Training

- Gas Bills (Front/Back, Customer Number, Meter Read Sequence, Computer Room Schedule, and Bill Handling Codes)
- Gas Rates (Explanation, Class Changes, Late Payment Charges, State Tax Surcharge Script, Conversion Factors)
- Commercial (Below 3% minimum usage, Combined Billing, Special Billing)
- Propane (Gas Beyond the Main)
- Payments (Payment Options, Commercial ACH payment process, Payment research requests, Unauthorized payments, Requests for consumption history)
- Utility Refunds (MEMO's, Delegation of Authority, Automated Refund System)
- Security Deposit (Deposit on bills, Refunding a security deposit)
- Customer Choice (EPRF screen, Natural Gas Choice, POR, Switching Suppliers, pending switch cancelation, Supplier enrollment, ARUS, ALTH, Migration Rider, Gas Cost Adjustment)
- Electric (Front/back of bill, Customer Class, Rates, Class Changes, Class 261 Accounts, appliance survey, common definitions)

- High Bills (Inquiries and disputes, reasons for high bills, methods to reduce consumption, transaction 075, HBI, meter test requests, trace lines/mixed meters, procedure for filing a PUC complaint)
- Billing Misc. (Tariff Charges comparison sheet, due date extension program, Empowerment, non-registering meters, budget billing, ABC plan, Distribution system improvement charge).

Agenda for Gas Emergency Training

- Gas leaks (Customer, non-customer, non-customer outside UGI Territory)
- Hits, Carbon Monoxide, Fire Calls, Make Safe Appliance, Mercury Regulators, Propane
- Emergency Call Procedures- off shifts
- 911 & Emergency Communication Centers.

Agenda for EGS Training

- Logging into and out of the CIS, Accessing, CIS main menu
- Screens: BILL, MENU, ARBH, UTAR, PYMT, KAHR, MEMC, TRAX, METI, DILR, MEMO, KRED, EMPP, SDCH, SDCD, KREV, INCM, STAY, DILR
- Shortcut or “hot” key
- Codes: Meter Reading Type, Customer Class, Late payment codes
- Common Transactions: Changing a Name/Mailing address, Add Sales Tax, Removing late payment charges, Adding special handling codes/ indicators
- LETA, ABC Plan, Budget billing, Due date extension program,
- Collections Process
- Payment processing rules, Payment methods: KUBRA, Autoscribe, APS and Check free; Returned Checks
- LIHEAP, LIURP, Operation Share, CARES, COS
- DOJM Manual, Job Codes
- Credit and collections general overview, Collections process, Methods to prevent Termination
- Protection from Abuse, Medical Certification, Bankruptcy, Theft and Revenue Protection
- Termination and credit related disputes
- Reconnection Procedure, Inactive Accounts, Shut Off In Error, Winter Turn On Policy
- Cut off for Nonpayment by street crew
- CWIP
- Predictive Dialer, LIVEOPS, MONET

Response of UGI to CAUSE-PA II-13

Question 13 (Prepared by Robert Stoyko)

What is UGI's policy and procedure for handling accounts with a Protection From Abuse Order or similar court order with clear evidence of domestic violence? Please explain and provide supporting documentation, including all call scripts, written policies and procedures, internal memoranda, or other directives regarding the processing and/or handling of client accounts where a Protection From Abuse Order or similar court order with clear evidence of domestic violence is presented to the Company.

Response:

Please see Attachments CAUSE-PA II-13-1, CAUSE-PA II-13-2, and CAUSE-PA II-13-3.

<u>Attachment File Name</u>	<u>Attachment Note</u>
<u>CAUSE-PA II-13-1.pdf</u>	
<u>CAUSE-PA II-13-2.pdf</u>	
<u>CAUSE-PA II-13-3.pdf</u>	

PFA Procedures

PFA: Protection from Abuse

Revised 08/24/2015

- Any person who has a PFA will be worked for termination using the PFA guidelines.
 - *If they are not listed as an occupant on income and occupancy, the plaintiff must provide us with proof.*
- **If both plaintiff and defendant are listed on the account, the balance may be transferred to the plaintiff's name only. "Benefit of Service" rules do not apply to PFA's.**
- All PFA's must have an expiration date.
- If a customer with a PFA indicator gets billed a security deposit due to their payment history, the deposit should not be waived. You should offer to split the deposit into three installments.
- If an applicant provides us with a PFA & they have no UGI history, request ID if required per Experian & waive the deposit. It can be billed later if they have poor payment history.
- **If an applicant provides us with a PFA and had a prior account with poor payment history, split the deposit into three installments. If service is inactive, the first installment is required for t/o.**
- Service cannot be terminated on a Friday, during any time of the year.
- Termination notices are only good for thirty (30) days, not the standard sixty (60) days.
- If a customer with a PFA gets SONP, UGI will bill the reconnect fee but the first installment is due with a portion of the gas bill to have the service restored. Follow the PFA P/A guidelines.
- **If the 2nd name line party calls to advise they have a PFA against the 1st name line, issue the COC. Make sure you advise the 2nd name line that the balance will be transferred to their new account. Also, the PFA must be faxed/mailed for the account to be coded as a PFA account.**
- If a customer with two broken P/A's calls and states that they have a PFA, once the PFA is received we must provide the customer with two PFA P/A's.
- **The PFA must be filed prior to being terminated for non-payment.**
 - **Example:**
 - Mary Jones was terminated for non-payment yesterday. She calls today to restore and states she has a PFA. Upon receiving the PFA, the date filed is today's date, which is after service is terminated.
 - **A PFA cannot be used to restore service. All applicable conditions must be met.** This includes a deposit (50% paid up front and the remainder billed), and any previous balance. Once conditions are met, we must restore within 24 hours.

- Prior to accepting a PFA, the PFA must be forwarded to the PFA team. They will verify any concerns with the legitimacy of the document.
- If a PFA is delivered to UGI, and it falls outside the scope of the standard Defendant is husband, Plaintiff is wife, seek assistance of the PFA team or Manager to verify the PFA Rules apply.

Termination Procedures

1. 10-day letter must be mailed through KOLL.
2. 3-day notice must be personal contact via collector or phone contact (dialer).
3. After 3-day contact, account must be KISU'd out of KOLL, and a STAY 52(PUC) will be entered for 30 days.
4. Must be served with a 2-day (48-hour) notice.

Once PFA is confirmed to be valid, the PFA indicator must be added to each account by using transaction T098, Sub-Code 1, Special Handling 48, Account Status 1.

*****ALL PFA'S ARE TRANSFERABLE FROM STATE TO STATE*****

2016 UGI PFA Payment Arrangement Guidelines

Gross Monthly Income

Effective 2/03/16

Family Size FPL	Level 1 (Below 150%)	Level 2 (151% -250%)	Level 3 (251% - 300%)	Level 4 (Over 301%)
1	\$0 - 1,485.	\$1,486 - 2,475	\$2,476 - 2,970	\$2,971+
2	\$0 - 2,003	\$2,004 - 3,338	\$3,339 - 4,005	\$4,006+
3	\$0 - 2,520	\$2,521 - 4,200	\$4,201 - 5,040	\$5,041+
4	\$0 - 3,038	\$3,039 - 5,063	\$5,064 - 6,075	\$6,076+
5	\$0 - 3,555	\$3,556 - 5,925	\$5,926 - 7,110	\$7,111+
6	\$0 - 4,073	\$4,074 - 6,788	\$6,789 - 8,145	\$8,146+
7	\$0 - 4,591	\$4,592 - 7,652	\$7,653 - 9,183	\$9,184+
8	\$0 - 5,111	\$5,112 - 8,519	\$8,520 - 10,223	\$10,224+
9+	\$520	\$867	\$1,040	\$1,040

Active Accounts - Customers

Terms	Review & Document I & O	Review & Document I & O	Review & Document I & O	Review & Document I & O
	\$15 + Average Bill No maximum term	\$30 + Average Bill No maximum term	\$60 + Average Bill No maximum term	\$100 + Average Bill No maximum term
Payment Agreement	First PA - - If down \$ paid today, 1st pymt starts in 30 days, down payment can be no less than 1/2 of payment. If no down \$, no more than 10 days, 2nd pymt 30 days later	First PA - - If down \$ paid today, 1st pymt starts in 30 days, down payment can be no less than 1/2 of payment. If no down \$, no more than 10 days, 2nd pymt 30 days later	First PA - - If down \$ paid today, 1st pymt starts in 30 days, down payment can be no less than 1/2 of payment. If no down \$, no more than 10 days, 2nd pymt 30 days later	First PA - - If down \$ paid today, 1st pymt starts in 30 days, down payment can be no less than 1/2 of payment. If no down \$, no more than 10 days, 2nd pymt 30 days later
PA Broken	If only 1 agmnt, offer 2nd <u>After 2nd PA -</u> Reinstate for missed P/A payments.	If only 1 agmnt, offer 2nd <u>After 2nd PA -</u> Reinstate for missed P/A payments.	If only 1 agmnt, offer 2nd <u>After 2nd PA -</u> Reinstate for missed P/A payments.	If 1st PA Broken: Reinstate for missed P/A payments. <u>2nd PA only issued if prior delinquency satisfied</u>

*All Residential customers except level 1 will be charged late payment charges

*CII (Change in Income: 10% decrease 0-200% fpl or 20% decrease > 200% fpl) or SIGCIC <300% (loss of HH inc due to illness, resident damage/loss, increase HH size) warrants renegotiated payment arrangement when proof is provided by customer.

RECONNECTION AT SAME PREMISE ---- Inactive Accounts - Customers & Applicants

	Review & Document I & O	Review & Document I & O	Review & Document I & O	Review & Document I & O
RH & RG Accounts	Multiply Total A/R balance by 20% - Take 1st installment as down payment, follow P/A terms above	Multiply Total A/R balance by 30% - Take 1st installment as down payment, follow P/A terms above	Multiply Total A/R balance by 40% - Take 1st installment as down payment, follow P/A terms above	Multiply Total A/R balance by 60% - Take 1st installment as down payment, follow P/A terms above
	+ Reconnection Fee (billed) * 30 days to next installment.	+ Reconnection Fee (billed) * 30 days to next installment.	+ Security Deposit + Reconnection Fee (billed) * 30 days to next installment.	+ Security Deposit + Reconnection Fee (billed) * 30 days to next installment.
	<u>After 2 Broken PAs</u> 100% of Arrears * Reconnection Fee (billed)	<u>After 2 Broken PAs</u> 100% of Arrears * Reconnection Fee (billed) + Security Deposit	<u>After 2 Broken PAs</u> 100% of Arrears * Reconnection Fee (billed) + Security Deposit	<u>After 1 Broken PA:</u> 100% of Arrears * Reconnection Fee (billed) + Security Deposit

*Deposits are 50% - upfront; then 25% - 2nd month and 25% - third month.

PFA's

Definitions:

PFA – A restraining order or order of protection is a form of legal injunction that requires a party to do, or to refrain from doing, certain acts. A party that refuses to comply with an order faces criminal or civil penalties and may have to pay damages or accept sanctions. The term is most commonly used in reference to domestic violence, harassment, stalking or sexual assault.

Scope:

These procedures are to be used when a PFA is received. It will also explain how a PFA is processed and how it protects a customer. The termination procedure for a PFA is also listed.

Procedures:

When a PFA is received, a MEMO should be sent to ZMCRD Attention PFA team for the indicator to be added to the bill screen. The PFA Team will add the indicator using a T098 transaction and it will appear in the lower right on BILL. Example:



- Any person who has a PFA will be worked for termination using the PFA guidelines.
- If both the plaintiff and defendant are listed on the utility account the balance may be transferred to the plaintiff's name only. **“Benefit of Service” rules do not apply in a PFA situation.**
- All PFA's have an expiration date which will be noted on MEMC.
- In the absence of credit history for an applicant, we would not request a security deposit at the time of application. We will allow the system to review and bill later if needed.
- Service cannot be terminated on a Friday during any time of the year.
- Termination notices are only valid for 30 days, not the standard 60 days.
- If service is terminated for non-payment, the reconnection charge is billed, not requested prior to reconnection.
- The PFA must have been filed prior to a non-payment termination.
 - Example: Service was terminated for non-payment yesterday. The customer calls and states that she has a PFA. We received a faxed copy showing it was only issued today, after the termination date.

- In this instance, the PFA cannot be used to restore the service. All applicable conditions must be met. These include security deposit and a utility payment. *Once conditions are met, we must restore within 24 hours.*
- Prior to accepting a PFA, it must be forwarded to the PFA team who will determine the validity of the document.
- If we receive a PFA outside of the normal husband/wife scope, seek assistance from the PFA team to verify if the PFA rules apply.

PFA Termination Procedures

1. 10-day notice mailed to the customer
2. 3-day notice via dialer or collector
3. *PFA team will remove from collections & place a 30-day STAY on the account.*
4. PFA team will enter a work order for a 2-day notice to be posted.
5. If no payment or agreement, service will be shut off.

Response of UGI to CAUSE-PA II-14

Question 14 (Prepared by Robert Stoyko)

How many calls, complaints, or requests has UGI received from customers with a Protection From Abuse Order or similar court order with clear evidence of domestic violence in the last five years, disaggregated by month? Please identify whether the call, complaint, or request was from an applicant or a customer.

Response:

The company cannot provide historical information. Our CIS system retains only the most recent account history with a PFA indicator. PFA's are tracked manually on a spreadsheet. In addition the indicator is placed on the account on the receipt date and removed on the expiration date. As of March 4, 2016, the company had 69 active PFA accounts.

No Digital Attachments Found.

Response of UGI to CAUSE-PA III-4

CAUSE-PA-III-4 (Prepared by Robert Stoyko)

See Attachment CAUSE-PA II-13-3. Please list the job title and job description of each member of the "PFA Team", and identify whether each has received domestic violence training, sensitivity training, or other relevant training since they joined to the PFA Team. If they have, identify the date, title, length, and agenda for the training as well as the organization and/or individual(s) who conducted the training.

Response:

The PFA Team consists of Contact Center Senior Representatives, Contact Center Supervisors and Contact Center Trainers. These team members handle call escalations and sensitive subjects, such as, but not limited to, PFA, bankruptcy, medical certification, and Red Flag Identity Theft inquiries.

Each member of the above teams are provided the PFA Procedures. In addition, they are provided information from the company's Customer Service Manager, received from PCADV (Pennsylvania Coalition Against Domestic Violence), received on 9/25/2013 during an Energy Association of Pennsylvania meeting. This packet contained material that helped our team understand domestic violence and how utility service and billing can create barriers for victims.

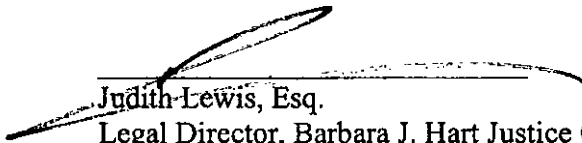
No Digital Attachments Found.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	Docket No. R-2015-2518438
	:	
UGI Utilities, Inc. – Gas Division	:	

VERIFICATION

I, Judith Lewis, verify that the *Direct Testimony of Judith Lewis, Esq. on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 3)* and *Appendices A and B* attached thereto were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


Judith Lewis, Esq.
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Scranton, PA 18510
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Date: June 1, 2016