



UGI Utilities, Inc. – Gas Division
UGI Utilities, Inc. – Electric Division

**Universal Service & Energy Conservation Plan
For the Five-Year Period
January 1, 2026 – December 31, 2030**

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I. INTRODUCTION

UGI Utilities, Inc. (“UGI”) hereby submits this revised Universal Service and Energy Conservation Plan (“USECP” or “Plan”) for the five-year period January 1, 2026, through December 31, 2030, to the Pennsylvania Public Utility Commission (“PUC” or “Commission”) for its review and approval in accordance with the Commission’s *Universal Service and Energy Conservation Reporting Requirements* at 52 Pa. Code §§ 54.71 – 54.78 and §§ 62.1 – 62.8. The USECP replaces and supersedes the UGI Companies’ Universal Service and Energy Conservation Plan for the period of January 1, 2020, through December 31, 2025 (the “2020-2025 USECP”) approved by the Commission at Docket No. M-2019-3014966 by Order entered January 16, 2020, and subsequent amendments thereto approved by the Commission at Docket No. M-2019-3014966 by Order entered June 16, 2022. The USECP pertains to the universal service programs of UGI’s Electric Division (“UGI Electric”) and Gas Division (“UGI Gas”).

This 2026-2030 USECP sets forth the rules, terms and conditions and funding levels under which UGI will administer its universal service and energy conservation programs and policies (“Universal Service Programs” or “USPs”) to eligible customers for the period of January 1, 2026, through December 31, 2030. **Appendix A** of the Plan sets forth the committed funding levels and budgets for each UGI division during this time period. **Appendix B** of the Plan sets forth the projected needs assessment as required by the Commission’s regulations at 52 Pa. Code § 62.4(b)(3).¹ **Appendices C & D** provide a list of third-party, community-based organizations (“CBOs”) to be utilized by UGI to assist in administering the Universal Service Programs. **Appendix E** sets forth UGI’s notification process to prompt customers to recertify for the Customer Assistance Program (“CAP”). **Appendix F** provides the Checklist, Common Application Form, and Zero Income form to be used for CAP. **Appendix G** provides the CAP Agency Audit Form and Scorecard. **Appendix H** provides a sample CAP opt-in solicitation communication. **Appendix I** provides UGI’s Communication Education and Outreach Plan (“CEOP”).

UGI Gas is a “public utility” and a “natural gas distribution company” (“NGDC”) as defined in the Public Utility Code, 66 Pa.C.S. §§ 102 and 2202, and is subject to the regulatory jurisdiction of the Commission. UGI Gas provides natural gas distribution service and supplier of last resort (“SOLR”) service. UGI Gas combined serves approximately 632,000 residential customers in 46 counties.

UGI Electric is a “public utility” and an “electric distribution company,” as defined in the Public Utility Code, 66 Pa.C.S. §§ 102 and 2803, and is subject to the regulatory jurisdiction of the Commission. UGI Electric provides electric distribution, transmission and default supply services to customers located in its certificated service territory. UGI Electric furnishes electric distribution service to approximately 55,000 residential customers located in portions of two northeastern Pennsylvania counties (Luzerne and Wyoming counties).

¹ The needs assessment was calculated for the total UGI Gas service territory. UGI Electric is not required to conduct a projected needs assessment because it serves fewer than 60,000 residential accounts. See 52 Pa. Code § 54.77.

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II. 2026-2030 USECP OVERVIEW

A. SUMMARY OF THE 2026-2030 USECP

1. USECP Programs

To assist low-income and payment-troubled customers located in their service territories, UGI has established the USECP in accordance with the Commission's regulations. UGI's Universal Service Programs include the following:

- Customer Assistance and Referral Evaluation Services ("CARES" or the "CARES Program");
- Hardship Fund or the "Operation Share Energy Fund" ("Operation Share");
- Customer Assistance Program ("CAP"); and
- Low Income Usage Reduction Program ("LIURP").

UGI also actively encourages payment-troubled, low-income customers to apply for grants from the Low-Income Home Energy Assistance Program ("LIHEAP").

2. Customers Served

In 2024, UGI assisted approximately 58,000 residential customers through its Universal Service Programs. The total number of participants by program for UGI Gas and UGI Electric in 2024 is set forth in Table 1:

Table 1. Universal Service Customers Served in CY 2024						
	CAP	LIURP	CARES*		Hardship Funds	Total
			CARES Referrals	LIHEAP Recipients		
South	12,743	253	210	9,976	1,092	24,274
North	8,992	172	184	9,596	444	19,388
Central	2,756	93	91	4,066	357	7,363
UGI Gas	24,491	518	485	23,638	1,893	51,025
Electric	4,643	77	42	1,539	536	6,837
Total Gas + Electric	29,134	595	527	25,177	2,429	57,862

*CARES consists of the number of CARES customers and the number of LIHEAP (Cash and Crisis) recipients; LIHEAP data based on 2023-2024 LIHEAP Program Year.

A summary of UGI's program expenditures for its Universal Service Programs in 2024 is provided below:

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Table 2. 2024 Universal Service Program Expenditures CY 2024					
Company	CAP	LIURP	CARES	Hardship Fund	Total
South	\$456,544	\$2,030,078	\$5,333	\$16,425	\$2,508,380
North	\$332,788	\$1,270,560	\$2,823	\$6,705	\$1,612,876
Central	\$85,312	\$757,417	\$1,673	\$5,355	\$849,757
UGI Gas	\$874,644	\$4,058,055	\$9,829	\$28,485	\$4,971,013
UGI Electric	\$148,936	\$334,904	\$627	\$8,100	\$492,567
Total Gas + Electric	\$1,023,580	\$4,392,959	\$10,456	\$36,585	\$5,463,580

3. Administration

UGI has dedicated employees who are trained and committed to ensuring eligible customers are referred to all appropriate Universal Service Programs (“USP Staff”) in order to provide the greatest benefits to customers. The USP staff is structured as follows:

- Director, Customer Programs and Public Relations² (1 full-time): Responsible for strategy, supervision, and regulatory oversight.
- Manager, Universal Services³ (1 full-time): Responsible for the day-to-day supervision of the group and all compliance and reporting requirements.
- Manager, LIURP. (1 full-time): Responsible for the day-to-day supervision of the group and all compliance and reporting requirements.
- Universal Service Program Administrator (1 full-time): Responsible for assisting management with reporting requirements of all Universal Service Programs.
- Senior Customer Outreach Representative (1 full-time): Responsible for leadership support of LIHEAP representatives, Operation Share, and CAP.
- Customer Outreach Representatives (6 full-time): Responsible for the day-to-day operations of LIURP, CAP, Operation Share, CARES and LIHEAP. Each maintains daily contact with the CBOs responsible for the administration of each program.
- LIHEAP Outreach Representatives (2 full-time)⁴: Responsible for the day-to-day operations of LIHEAP. Each maintains daily contact with County Assistance Organizations (“CAO”) responsible for the administration of LIHEAP.

UGI contracts with CBOs to assist the USP Staff with customer referrals and administration of the USPs. Together, the USP Staff and the CBOs have the capability to screen, enroll, and refer

² In April 2025, the Director, Customer Programs and Public Relations position was created replacing the former Senior Manager, Credit Collections & Regulatory Compliance position.

³ In March 2022, the Manager Universal Services position was created replacing the former Customer Outreach Senior Supervisor position.

⁴ In February 2020, UGI moved from four to two full-time LIHEAP Outreach Representatives.

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customers for all available Universal Service Programs. The USP Staff incorporates all USP referrals into existing processes (Cold Weather Interim Procedure (“CWIP”), collection, compliance and contract management). In addition to referrals to all USP components, referrals are also made to LIHEAP and State Weatherization programs.

4. Communication

There are numerous means by which the USP Staff and its CBO partners provide residential customers with information on available programs (as detailed in Appendix I, the CEOP) and assist them in receiving assistance from CBOs. Information about the USPs is delivered to customers through various communication channels and through the USP Staff upon customer inquiry. UGI has a dedicated toll-free telephone number, 1-800-UGI-WARM that customers can call to get program information. UGI also maintains a page on its website that provides information on universal service programs and eligibility: <https://www.ugi.com/customer-services/customerassistance/>.

UGI utilizes additional communication channels permitting its customers to apply and/or recertify for CAP over the phone with provision of supportive documentation through mail, or additional means, as permitted by the CBOs. Additionally, UGI Gas provides detailed information regarding its USPs in its new customer welcome packet that is sent to UGI Gas customers who recently converted to natural gas.⁵ Moreover, UGI Electric: (1) solicits Electric customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company’s CAP two times a year until at least the effective date of the Company’s next USECP; (2) accepts verbal self-reported income eligibility for electric customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other electric customer contact with the call center for an unpaid bill; and (3) automatically enrolls electric LIHEAP recipients into CAP according to specific conditions.⁶

B. SUMMARY OF CHANGES TO PLAN

As required by Section 62.4 of the Commission’s regulations, 52 Pa. Code § 62.4, this section of the Plan describes the modifications and enhancements made to UGI’s Commission-approved 2020-2025 USECP. Set forth below is a description of the changes made to the individual Universal Service Programs. Changes that touch on more than one program include: (1) identification requirements and Household Income Documents necessary for program enrollment; and (2) revisions to enrollment and budget projections.

1. Operation Share Energy Fund

UGI is clarifying in this USECP that awarded hardship grant amounts can be used to pay for restoration fees, including reconnection fees, if applicable, to the extent of the awarded grant amount for customers or applicants who are income-qualified for the program, regardless of the

⁵ See Paragraph 45 of UGI Gas’s 2022 Rate Case Settlement at Docket No. R-2021-3030218.

⁶ See Paragraph 60(a) of UGI Electric’s 2023 Rate Case Settlement at Docket No. R-2022-3037368.

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customer or applicant's prior or current enrollment in CAP. UGI also is clarifying that CAP customers are eligible to receive Operation Share grants.

UGI is removing language regarding Company matching of Operation Share contributions made by customers, employees or other sources. Such matching has been replaced by the Company's annual contribution amounts.

Additionally, customers with delinquent balances are encouraged to contact the Credit Department to discuss their options, however, customers whose service has been terminated must contact the Credit Department to discuss their options because CBOs cannot provide benefits on an inactive account.

Finally, this USECP includes the flexibility to reallocate up to 25% of UGI Gas's regional (South, North, Central) annual Operation Share budget.

2. CAP

The 2026-2030 Plan includes the following changes to CAP:

If a UGI customer checks the box on their LIHEAP application to share data with utilities, UGI will utilize DHS data sharing income information. DHS's income and household member information will be utilized to have UGI Gas customers "opt in" to participate in CAP.

The Company also will use the DHS data for recertification purposes. If UGI Gas and UGI Electric customers have income and household member information that is being shared with utilities from the LIHEAP application, the customer will not need to recertify every 3 years. The Company will inform CAP customers recertified with LIHEAP household data if or how their monthly CAP bill will change and how to contact the utility if their information has changed since completing the LIHEAP application.

CAP customers that are removed for failing to recertify and have missed CAP payments, must first satisfy their missed CAP payments prior to being reinstated into CAP.

Customers who have not participated in LIHEAP, or who have not gone through the Company's income verification process, must provide identification as described in the CAP Identification for CAP Eligibility section below to enroll in a Universal Service Program. Additionally, these identification eligibility requirements are being standardized across all of UGI's USECP programs, except for the CARES program, to streamline the application process.

For purposes of program standardization, and for non-LIHEAP recipients, UGI is applying the Household Income Documents provisions in the CAP section to the other USECP programs, except for CARES, to demonstrate program eligibility based on the applicable income guideline levels.

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The Company revised its CAP requirements such that it will not remove customers from CAP if they do not apply for and direct to UGI LIHEAP Cash or Crisis grants.

The Company is clarifying that CAP customers who request to be removed from the program, even though they benefit from it, will forfeit all program benefits upon removal. Additionally, if CAP is no longer beneficial to the customer and they choose to be removed, there is no twelve-month wait to re-apply.

3. LIURP

The 2026-2030 Plan includes the following changes to the LIURP program:

UGI Gas is increasing the maximum spending per LIURP job, where gas furnace or boiler replacement is not required, from \$8,000 to \$10,000.

UGI Electric has included a Minimum Usage Criteria threshold of 6,000 kWh for electric baseload (non-heating) LIURP jobs.

For this 2026-2030 USECP, the LIURP budgets for UGI Gas and UGI Electric will increase commensurate with the residential percentage rate increase approved in any UGI Gas or UGI Electric base rate case that is adjudicated within the term of this USECP. If there is not any applicable base rate case, the LIURP budgets will increase by 3% over the prior year budgets.

This USECP includes the flexibility to reallocate up to 50% of UGI Gas's regional (South, North, Central) annual funding in the event that certain LIURP agencies are underspent, and their budgets could be better utilized in other areas.

C. NEEDS ASSESSMENT

As required by 52 Pa. Code § 62.4(b)(3), UGI Gas has performed and included a needs assessment for this Plan, which is presented on a combined basis in Appendix B.⁷ UGI Electric is not required to conduct a projected needs assessment because it serves fewer than 60,000 residential accounts. See 52 Pa. Code § 54.77. However, the Company has provided the Electric needs assessment below in Table B-2.

III. THE CARES PROGRAM

A. DESCRIPTION OF THE CARES PROGRAM

1. Goals and Objectives

The goal of the CARES Program is to provide personal assistance and referrals to payment-troubled customers and to help improve their delinquent bill payment problems. The CARES

⁷ In the last USECP, UGI indicated that future USECPs would include needs assessments on a combined basis.

Program identifies customers in need and guides them to the appropriate program or agency. CARES concentrates on, but is not exclusively for, the low-income segment that may lack the knowledge of energy conservation, budget counseling, and fuel assistance programs. Unlike other USPs administered by UGI, the CARES Program is geared toward the customer who has a temporary, immediate need, such as loss of income, loss of head of household, illness or any other temporary situation resulting in an inability to pay. CARES is intended to be a short-term assistance referral program to guide a customer through a difficult time and to help inform and educate them about the available assistance. The CARES Program also provides extensive LIHEAP outreach to help increase awareness of the program and encourage all eligible households to apply for grants. All customers who provide UGI with a copy of their Protection from Abuse (“PFA”) order or a court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence, are handled by the smaller number of CARES representatives for specific program referrals and payment options.⁸

2. Program Design

The CARES Program was developed as an outreach and referral service to assist customers with special hardships. CARES is available to any residential customer who is confronted with a temporary hardship that could result in the loss of utility service. Assistance is obtained through UGI’s programs and the established network of social agencies. CARES is designed to help a select group of customers with special circumstances, which may include, among other things, the need for help in paying their utility bill or assistance from a social agency. UGI offers information, guidance and referrals to obtain energy assistance and other social help programs from the Customer Outreach Department. Each CARES customer may receive an informational mailing. The mailing contains educational material on each of the assistance programs and any other referral information that may be helpful to the customer.

At appropriate times of the year, eligible CARES customers receive information on additional Customer Outreach programs, such as LIURP, CAP, and the Operation Share Energy Fund, as well as referrals to LIHEAP.

B. FUNDING AND BUDGET

See **Appendix A** for the UGI’s budgets for the CARES Program.

C. ELIGIBILITY CRITERIA

Any residential customer with a delinquent balance or a negative ability-to-pay and special circumstance may be eligible for CARES. For example, recent unemployment, disability, loss of head of household, inability to understand their bill, temporary illness or need for senior citizen assistance, would render a customer eligible for CARES.

⁸ See Paragraph 53 of the Settlement approved in UGI Gas’s 2016 Rate Case at Docket Nos. R-2015-2518438, *et al.*

D. INTAKE / NETWORKING

Customer Outreach employees maintain contact with CBOs through referrals and educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers in energy conservation and to increase public awareness of the various CARES Program services. Presentations are made throughout the service territory and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues.

IV. THE OPERATION SHARE ENERGY FUND

A. PURPOSE & OBJECTIVES

A number of causes, foreseen and unforeseen, could potentially affect the ability of customers to pay their bills. UGI's hardship fund – Operation Share Energy Fund – has been formed for the purpose of providing assistance to residential customers faced with a hardship in paying their energy bill due to an unforeseen situation. To achieve its purpose, the Operation Share Energy Fund includes the following objectives:

- Provide customers, employees, and the public an opportunity to contribute money to help their less fortunate neighbors who are unable to pay their energy bills due to unforeseen circumstances;
- Give financial assistance to current customers that have fixed or low incomes or are unemployed, disabled, or faced with some catastrophic event or crisis situation;
- Contribute additional funds and support to community organizations that are dedicated to this same purpose.

Awarded hardship grant amounts can be used to pay for restoration fees, including reconnection fees, if applicable, to the extent of the awarded grant amount for customers or applicants who are income-qualified for the program, regardless of the customer or applicant's prior or current enrollment in CAP.

B. FUNDING AND BUDGET

Operation Share funding will be used to make payments directly to residential customers declared eligible by the designated administering agency, less amounts used for administrative expenses. Employees of UGI are encouraged to make a donation directly to Operation Share. Additional fundraising events also may be organized. It is intended that an appeal will be made at least once during the year to all of UGI's customers, via a billing insert, to make a contribution to Operation Share. The insert describes Operation Share and requests support with a donation for any amount. Additionally, UGI will send an email annually to e-bill customers about Operation Share and how to donate.

See **Appendix A** for UGI's funding for the hardship fund.

C. ADMINISTRATION

Operation Share is administered by UGI's USP Staff using the Customer Outreach System ("COS"). The COS provides customer information, such as eligibility criteria, account balance, recent bills and payments. UGI contracts with CBOs that have the ability to process grants using web-based applications, which then use the account information from the COS to determine the amount of grant awarded to the customer. The COS also maintains the financial aspects of the program.

A specific role is established in the COS for the representative that has the final authority to approve or deny assistance for a customer. This designated person is responsible for the Operation Share funds assigned to a CBO. UGI's personnel will not participate in the determination of grants, other than to refer applicants to the CBO for consideration.⁹

Operation Share Energy Fund is designated as a public charity under section 501(c)(3) of the Internal Revenue Code. All donations from customers, employees, and outside sources are kept in a separate Operation Share bank account and passed directly to the participating agencies to permit them to make direct payments to energy vendors for those applicants who qualify.

D. ELIGIBILITY

The guidelines for grants from Operation Share allow for administrative flexibility in providing assistance. See the CAP Identification for CAP Eligibility section below for identification requirements applicable to the Operation Share program. To ensure fair treatment of all applicants, however, the following guidelines must be followed (unless UGI or the CBOs agree to waive or modify a guideline in extraordinary circumstances):

- The customer must have a residential account with UGI and the customer's premises is the customer's primary residence;
- The customer must have an active heating or non-heating utility account;
- The customer must not have received the maximum Operation Share grant amount within the last 12 months;
- The customer must have an outstanding balance on their utility bill;
- The maximum income of a gas or electric customer's¹⁰ household must be at or below the current federal poverty income guidelines ("FPIG") of 250%;
- The customer must provide proof of identification and adequate information to demonstrate inability to pay energy bills (as set forth in the Household Income

⁹ There are some occasions where personnel will approve Operation Share on a customer's behalf, for example, in the instance of a legislative request to supplement LIHEAP grants.

¹⁰ See Paragraph 58 of UGI Electric's 2023 Rate Case Settlement.

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Documents provisions in the CAP section) ;¹¹

- Customers with delinquent balances are encouraged to contact the Credit Department to discuss their options, however, customers whose service has been terminated must contact the Credit Department to discuss their options because CBOs cannot provide benefits on an inactive account.
- CAP participants are eligible to receive Operation Share for their past due CAP.
- Hardship funds through Operation Share may be used for restoration of service, including reconnection fees (if applicable) for income-qualified UGI customers or applicants, regardless of the customer's or applicant's prior or current enrollment in CAP.
- CAP customers do not need to prove additional hardships to qualify for an Operation Share grant.

Residential accounts with the following indicators are not eligible for this program:

- Health care facilities;
- Landlord/tenant (account is in the landlord's name);
- Ratepayer/occupant (the ratepayer does not reside at the property);
- Foreign load (one-meter supplies more than one unit);
- Theft of service; and
- Landlord if Shut-off ("LIFSO") agreement (account is in the name of the owner or landlord).

To ensure fair treatment of all customers, the following amounts represent the maximum grant to be awarded per eligible customer in each of UGI's divisions and rate districts.

Table 3. Maximum Operation Share Grant	
Division	Maximum Amount
UGI Gas	\$600 ¹²
UGI Electric	\$600 ¹³

¹¹ Necessary information includes evidence of income of all members of the household. In addition, the applicant will authorize the CBO (verbally or written) to obtain account history information from their energy vendor. There is no requirement that each household member must verify household expenses as part of the Operation Share application process.

¹² See Paragraph 49 of the 2022 Gas Rate Settlement.

¹³ See Paragraph 58 of the 2023 Electric Rate Case Settlement.

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Exceptions to the maximum grant amount may be approved for special circumstance customers.

E. PAYMENT OF GRANTS

The designated CBO is granted a maximum amount against which payments can be allocated. As long as the CBO's maximum amount is not exceeded, a payment to the customer's account will be honored and applied by UGI.

All cash funds must be retained by the CBO in its Operation Share account and payments from this account shall only be made to UGI. Under no circumstances will any payments be made directly to a customer. In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, on January 1, 2024, UGI Electric increased its annual Operation Share funding in the amount of \$30,000, bringing the annual funding to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding. In accordance with Paragraph 60(e) of the 2025 UGI Gas Base Rate Case settlement, the Company is permitted to increase the annual Operation Share and LIURP budget reallocation limitations across the geographic footprint of its former rate three rate districts from 5% to 50% in the event that certain agencies are underspent, and their budgets could be better utilized in other areas. If any reallocation of funds from one of the former three rate districts to another exceeds 25%, UGI Gas will file a letter with the Commission at its USECP dockets explaining the reason for the reallocation.

In the 2026 base rate cases ("BRCs"), UGI Gas and UGI Electric committed to increase their 2027-2029 contributions to Operation Share to \$150,000 for Electric and \$1,000,000 for Gas. These commitments will be honored regardless of outcome of the BRCs.

V. CUSTOMER ASSISTANCE PROGRAM

A. INTRODUCTION

CAP provides all eligible low-income, payment-troubled residential customers that reside in UGI's service territory a more affordable way to pay their natural gas or electric bill. Each month, CAP participants are billed an equal CAP payment amount based on the participant's gross income or average bill,¹⁴ depending on which option provides the most affordable monthly CAP payment.

In this 2026-2030 USECP, UGI will continue the practice instituted in the 2014-2017 USECP to place no limit on CAP enrollment or set a maximum CAP credit per customer.

B. INTAKE/NETWORKING/EDUCATION

Customer Outreach employees maintain contact with CBOs through referrals and

¹⁴ If a customer's historical usage for twelve months is not available, the average bill amount will be based on the historical usage of all CAP customers or the residence, whichever is lower.

educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers about the benefits of CAP. Presentations are made throughout the service territory, and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues. UGI will seek feedback during its Universal Service Advisory Committee (“USAC”)¹⁵ meetings regarding opportunities to provide consistent consumer education to CAP customers during their participation in CAP.

C. FUNDING AND BUDGET

See **Appendix A** for a more detailed description of CAP funding.

D. ADMINISTERING AGENCIES

CAP is administered by a variety of CBOs, listed in **Appendix C** of this Plan (the “CAP CBOs”), that are overseen by UGI’s Manager, Universal Services.¹⁶ Customers enrolling in CAP can receive assistance with CAP-related issues by contacting either UGI or its CAP agencies.

In accordance with Paragraph 59(a) of the 2025 UGI Gas Base Rate Case settlement, the Company began using the PUC’s Common Application Form for enrollment in CAP in December 2025. See Appendix F. With the help of the COS, the CAP CBOs are responsible for taking the following steps to enroll customers in the CAP¹⁷:

- Verify the application is complete and consent has been obtained;
- Properly complete the CAP enrollment;¹⁸
- Verify eligibility, proof of identification, proof of income and family size;
- Assist applicant to properly complete LIHEAP and other grant applications;
- Fully explain the program benefits and responsibilities to the customer;
- Discuss the payment amount, based on guidelines provided by UGI;
- Inform applicants in writing, or orally during in-person engagements that may occur, of missing information along with steps the applicant can follow to provide that information;
- Confirm customer’s acceptance in the program; and
- Inform applicants in writing if CAP application is denied along with steps the

¹⁵ UGI’s USAC convenes at least twice per calendar year and consists of interested stakeholders, including, but not limited to, the active parties at this docket, CBOs, and the Commission’s Bureau of Consumer Services.

¹⁶ Prior to March 2022, the former Customer Outreach Senior Supervisor position oversaw the CAP CBOs.

¹⁷ UGI’s USP and/or Call Center Staff may also enroll eligible customers in CAP.

¹⁸ The CAP enrollment process will include application completion via telephone or mail when an in person visit is not required or feasible.

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applicant can follow to contest denial.

The CAP CBOs will provide customer education in the areas of:

- Usage reduction education consistent with that outlined in LIURP below;
- Low cost/no cost energy conservation tips;
- Basic household budget counseling; and
- Related items specific to the individual applicant's needs, including providing an energy education session for customers who historically have an above average usage.¹⁹

The CAP CBOs are responsible for: (1) referring participants to any other assistance, social, or governmental programs that may provide help for any other present needs; (2) monitoring each account monthly based on UGI's prompted tasks as listed in the COS, such as past due balance phone calls and recertification; and (3) providing energy education sessions to above average usage customers (i.e., customers exceeding the CAP high usage criteria in Table 4).

Finally, while the CAP Administering Agencies will be responsible for processing the annual recertification of all requirements, UGI itself will process appeals for reconsideration from participants removed from CAP within 30 days.

Alternative Means of Communication for CAP Enrollment and Recertification

UGI will allow customers and applicants for service to apply and/or recertify for CAP over the phone, with provision of supportive documentation through mail or other means (including but not limited to fax, email, or text messaging) that are reasonably available to the Company's CBO serving that portion of UGI's service territory. Once the CBO has verified that all of the documentation is received and accurate, the Company will send a Welcome Letter to the applicant, which will: (1) confirm that the applicant has been approved for CAP; (2) provide the applicable CBO contact information; and (3) explain that at any time the customer may unenroll from CAP. In-person appointments with a CBO will remain available to those individuals who choose to apply in person. The available means of communication for each CBO is indicated on **Appendix C**.

Direct Solicitation

UGI solicits customers who self-reported Level 1 income in the prior twelve months for enrollment in the Company's CAP two times a year.²⁰ Beginning in 2023, the solicitations have occurred and will continue to occur in spring and fall of each year thereafter.

On 10/10/24 DHS began its data sharing initiative providing income verification data to

¹⁹ UGI will monitor CAP customer usage and implement controls to avoid excessive CAP customer usage.

²⁰ See Paragraph 60(a) of the 2023 UGI Electric Rate Case Settlement as applicable to UGI Electric customers. UGI Gas also performs these solicitations.

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utilities. On 12/18/24, DHS instructed utilities to stop using the data it provides due to concerns with accuracy. The Company began receiving corrected DHS files in December 2025 and soon after began utilizing DHS data sharing to solicit UGI Gas customers to opt-in to CAP. Since the UGI Gas process was designed as opt-in, customers must confirm that they wish to participate in CAP and then will be enrolled assuming all eligibility criteria have been met. See Appendix H for sample communications for UGI Gas. Electric customers are also solicited for CAP but must contact the Company to opt out as further described below in Section G, the Electric Auto-Enrollment Pilot paragraph.

E. MONITORING

UGI will provide routine information and metrics to the CAP CBO pertaining to the performance of the administration of the program. In addition, UGI will make routine contact with the agencies and will also conduct annual training updates for CAP caseworkers. Further, UGI will audit agency performance by reviewing enrollments, re-certifications, and completed tasks. The audit will include confirmation that the appropriate paperwork is signed and when required, income verification and customer identification were obtained. The COS will maintain specific agency statistics such as: number of program participants; percentage of CAP customers that are past due; and an active list of customers that require re-certification. UGI's audit checklist and CBO scorecard are outlined in **Appendix G**.

F. EVALUATION

As required by the Commission's regulations, 52 Pa. Code § 62.6, both a program process evaluation and impact evaluation were performed in 2024 by an independent, third-party evaluator (APPRISE), which provided a report of findings addressing the following areas:

- Program design;
- Administrative costs;
- Program costs;
- Payment behavior;
- Consumption habits; and
- Energy assistance participation.

The deadline for filing UGI's next USECP evaluation report is November 1, 2029 as directed by the USECP Order issued by the Commission on June 4, 2026 at Docket Numbers M-2025-3054362 and M-2025-3054366 in Ordering Paragraph 29.

G. CUSTOMER ELIGIBILITY REQUIREMENTS

To be eligible for CAP, customers may be referred by UGI or CAP CBOs. To be eligible, a customer must: (1) complete the CAP application and have gross household income verified at

150% of FPIG or less;²¹ (2) be a residential heating or non-heating customer with service from UGI; and (3) if a previous participant, a review will be completed to assure that the reason for the prior default has been cured or that the customer has been out of the program for a minimum of 12 months for a voluntary removal. UGI Gas and UGI Electric customers between 151% and 200% FPIG, who are rejected from CAP as being over-income have received and will continue to receive a WARM referral.²² A WARM referral automatically refers these customers to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). Eligible (income verified) customers can enroll in CAP as a means of restoring service, even if service has been terminated within the past 30 days, if all program and restoration requirements are met. Income verified customers who have never participated in CAP can restore service by enrolling in CAP and having any balance owed deferred for Pre-Program Arrearage (“PPA”) forgiveness. The Company proactively determines if these customers qualify for benefits under these other programs without any need for the customer to apply for benefits. Benefits to qualifying customers include weatherization measures at residences and/or energy assistance grants for heating bills.

UGI Electric Auto-Enrollment Pilot

Since the Final order issued in the 2023 UGI Electric Rate Case, UGI has engaged in an Auto-Enrollment Pilot.²³ UGI Electric implemented an interim pilot to manually process auto-enrollments until DHS began sharing its data, after which UGI Electric would be given a reasonable period to implement IT modifications to auto enroll non-shopping LIHEAP recipients into CAP, including recertification. Effective May 2026, UGI Electric began actively utilizing information received from the DHS data sharing process to solicit customers for enrollment into CAP, thus ending the interim auto enrollment pilot agreed to in Paragraph 60(e)(v) of the 2023 Electric Base Rate Case settlement. The auto enrollment was developed as an “opt-out” process which requires customers to contact UGI Electric if they do not want to be enrolled in CAP. Customers receive a letter in the mail with a deadline, typically 10-15 days, to contact the Company and opt out of CAP. Customers can either call the UGI Contact Center or email the Customer Outreach Department. Customers who do not respond by the deadline are enrolled in CAP. The following provisions apply to automatically enrolled LIHEAP recipients:

- Deemed as being confirmed low income customers²⁴ eligible for winter shutoff protections.

²¹ A customer with no income will be eligible to participate in CAP and be responsible to make the minimum monthly CAP payment. Customers who received LIHEAP within the past 12 months are eligible for simplified enrollment and do not need to complete a CAP application.

²² See Paragraph 44(c) of UGI Gas’s 2022 Rate Case Settlement.

²³ See Paragraphs 60(c)-(d) of the 2023 UGI Electric Base Rate Case Settlement.

²⁴ Confirmed low-income customers are income verified, with income at or below 150% of the Federal Poverty Level, plus customers who have received an Operation Share grant. Pursuant to settlement of the 2022 Gas Base Rate Case (Docket No. R-2021-3030218), UGI expanded eligibility for Operation Share grants up to 250% FPL. Additionally, per Paragraph 44(c) of the 2022 Gas Rate Case Settlement, UGI Gas expanded LIURP access to Gas customers between 151% and 200% of the FPL commencing on January 1, 2023.

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- Placed on either a CAP Percent of Income Payment Plan or average bill based on income information provided through the DHS Data Sharing Process, whichever is more advantageous to the customer. Customers reporting zero income are placed on the minimum bill plan.
- Provided notice with opportunity to opt out.
- Must recertify annually unless LIHEAP is received and the customer has participated in DHS Data Sharing in the current or prior season.
- Auto-enrolled CAP customers can include arrearages less than \$300 as PPA debt forgiveness if they later re-enroll in the program.
- Eligible for a one-time payment agreement (after they leave or are removed from CAP) on arrears while enrolled in CAP average bill program.

Identification for CAP Eligibility

UGI customers who have not participated in LIHEAP, or who have not gone through the Company's income verification process, must provide identification as described herein to enroll in a Universal Service Program, except for the CARES program. These identification eligibility requirements are being standardized across all UGI's USECP programs, except for CARES, to streamline the application process, except as specified herein. As of December 2025 when the Company began using the Common Application Form, an applicant's Social Security Number ("SSN") is no longer requested for any of UGI Gas or UGI Electric's Universal Service Programs. The permitted forms of identification are set forth below:

1. One government issued photo identification such as:
 - Driver's License;
 - Passport;
 - Military ID card;
 - ID cards issued by the Federal, State, or Local Government; or
 - Any valid foreign government ID.
2. Two alternative forms of identification if a government issued photo identification is not available, such as:
 - College student ID card;
 - Social security card;
 - Voter registration card;
 - Birth Certificate;
 - U.S. Citizen ID card/ Permanent Resident Card;
 - Native American Tribal Card; or
 - ITIN (Individual Taxpayer Identification Number).

All forms of identification must be valid and not expired.

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Residential accounts with the following indicators are ineligible for CAP, and all other USECP programs, or will be removed from CAP, and all other USECP programs:

- Health care facilities;
- Landlord/tenant (account is in the landlord's name);
- Ratepayer/occupant (the ratepayer does not reside at the property);
- Foreign load (one-meter supplies more than one unit);
- Theft of service;
- LIFSO agreement (account is in the owner's name);
- Choice customers;
- Utility service used to operate a swimming pool; or
- A residential property where more than 50% of the anticipated usage served through a single meter is used to operate a business.

UGI further reserves the right to deny enrollment if the customer is deemed to lack good faith, honesty, or fair dealing while working with the CAP CBO or UGI during the application process or if the customer fails to engage in good faith efforts to conserve energy. Demonstration of lack of good faith, honesty, and fair dealing may be evidenced by fraud or theft of service. The Company defines "fraud" as the intentional misrepresentation of CAP eligibility criteria. "Theft of Service" occurs when a person obtains utility service by deception, tampering with Company facilities, or other means designed to avoid payment for utility service provided by the Company. The two most common examples of theft of service are: (1) a customer's physical bypass of a meter so that all or part of the energy usage is not recorded; and (2) the magnetic tampering of a meter to impede the registration of usage. However, this list is not conclusive, and other instances of theft may arise that result in a customer's disqualification from CAP.

Upon request, subject to the recertification process, a CAP participant must provide evidence of continued program eligibility, which they may do via the communication means indicated in **Appendix C**.

If a CAP participant changes residences, the following conditions will apply and be communicated to the customer: (1) as long as all eligibility requirements and other terms and conditions continue to be met, the participant may remain eligible to participate in CAP; and (2) so long as the participant remains enrolled in the program, no late payment charges will be imposed. Customers who request transfer of service to a new residence will receive information on the Company's Universal Service Programs in written communication.

An applicant determined ineligible receives written notification specifying the reason(s) for ineligibility. If the applicant is not satisfied with the determination of eligibility, the Company will use dispute procedures set forth in Sections 56.151 and 56.152 of the Commission's regulations. The applicant may also appeal the denial of eligibility to the Bureau of Consumer

Services in accordance with 52 Pa. Code §§ 56.162-56.166, relating to informal complaint procedures and may pursue a formal complaint against the Company. Notice of right to appeal will be provided with the written notification of ineligibility.

H. MONTHLY CAP PAYMENT AMOUNT

1. Determination of Monthly CAP Payment Amount

The amount to be paid by a CAP customer each month will be based on the lower of the percentage of the customer's monthly income, as described below, or the customer's otherwise applicable average monthly bill.²⁵ To determine the customer's monthly CAP payment amount based on the percentage of the customer's income, the customer's monthly income is compared to the FPIG, and the payment amount is set based on the following guidelines:

²⁵ Exceptions to the payment schedule and grant application practice will be made based on individual needs.

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Electric and Natural Gas Non-Heating Customers

Household Income as Percent of FPIG	Monthly CAP Payment
0-50%	2% of Participant's Monthly Income
51-100%	4% of Participant's Monthly Income
101-150%	4% of Participant's Monthly Income

Natural Gas Heating Customers

Household Income as Percent of FPIG	Monthly CAP Payment
0-50%	4% of Participant's Monthly Income
51-100%	6% of Participant's Monthly Income
101-150%	6% of Participant's Monthly Income

Electric Heating Customers

Household Income as Percent of FPIG	Monthly CAP Payment
0-50%	6% of Participant's Monthly Income
51-100%	8% of Participant's Monthly Income
101-150%	9% of Participant's Monthly Income

Both gas and electric customers with no income will be responsible to make the minimum monthly CAP Payment.

If a customer's monthly CAP payment amount as a percentage of the customer's monthly income, as calculated above, exceeds the customer's otherwise applicable average bill amount, the customer's average bill will be set as the customer's monthly CAP payment amount.

At any time during the program should a participant's monthly income change, the monthly CAP payment amount will also be reviewed and changed, where appropriate. It is the customer's obligation to notify the company or the CAP Administering Agency of the change in income. UGI reserves the right to require that the customer provide proof of the change in income. A recertification will be processed using the updated income and historical usage to determine the new monthly CAP payment amount.

Additionally, the participant's monthly CAP bill will be reevaluated quarterly to ensure that the participant is actively on the most affordable billing option. For example, if the customer entered into CAP with a percent-of-income plan, and upon a quarterly review, the customer's average bill is deemed to be the most affordable at the time of the review, the customer's new CAP will be based on their average bill until the next review. Historical usage for CAP customers is incorporated into the determination of quarterly CAP bill adjustments. If a customer's historical usage for twelve months is not available, the average bill amount used for the quarterly CAP bill

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review will be based on the historical usage of all CAP customers or the residence, whichever is lower.

UGI's minimum monthly CAP payment is within the suggested range set forth in the Commission's Policy Statement on Customer Assistance Programs at 52 Pa. Code § 69.265(3)(i)(A)-(C). The CAP payment is set at \$25 for gas heating accounts, \$15 for non-heating accounts, and \$30 for electric heating accounts.

CAP customers will be charged no more than their prorated CAP billing amount for usage incurred during their final billing period.

Customers who voluntarily remove themselves from CAP will be required to remain out of the program for twelve months unless they pay the CAP catch-up amount.

2. Household Income Documents

To determine CAP eligibility and the appropriate CAP monthly payment, proof of income at or below 150% of FPIG must be provided by the customer to the Company. In accordance with Paragraph 59(c) of the 2025 UGI Gas Base Rate Case settlement, customers who have received a LIHEAP grant within the current or prior LIHEAP season and opted into LIHEAP data sharing are not required to provide income documentation for CAP, LIURP, or Operation Share. For these customers, the Company will accept self-certification of income level for the purpose of calculating the customer's monthly payment and no documentation of income is required for such customers. UGI Gas and UGI Electric accept verbal self-reported income eligibility for customers at or below 250% of the FPIG during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period.²⁶ The following acceptable income documents also apply to the Company's other USECP programs, except for CARES. Proof of income is required to demonstrate program eligibility based on the applicable income guideline levels.

Acceptable income documents are included in Table 4 below²⁷:

Table 4
Acceptable Income Documentation and Time Periods

Type of Document	Acceptable Period
Pay Stub	Last 30 days or 12 months of income
Form W-2	Most Recent Available

²⁶ See Paragraph 60(b) of UGI Electric's 2023 Rate Case Settlement.

²⁷ Customer can choose to provide 30 days or 12 months of income, whichever timeframe is most beneficial and reflective of actual annual household income.

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Benefit Letter	Prior year if current award letter is not yet available
Bank Statement	Last 30 Days or 12 months of income
Social Security	Prior year if current award letter is not yet available
Pension	Prior year if current award letter is not yet available
Disability	Prior year if current award letter is not yet available
Supplemental Security Income	Prior year if current award letter is not yet available
Alimony Support	Most Recent Available
Unemployment Designation Letter	Current approval letter
Notarized Letter Stating Income*	Most Recent Available (within 30 days)
Zero Income Form	Must be completed at the CBO
Rental Income	Last 30 Days or 12 months of income
*This is if none of the other document types listed are available. This would apply to seasonal or gig work.	

Additional Notes:

- Interest does not need to be counted as income.
- UGI does not include income earned from an occupant under the age of 18, nor does it include income received for the benefit of a minor, in its calculation of household income.

3. Use of LIHEAP Grants

LIHEAP grants received will be applied consistent with the Commonwealth of Pennsylvania's Low-Income Home Energy Assistance Program – Final State Plan ("Final State Plan") and any subsequent amendments or changes thereto.

4. Late Fees & Security Deposits

While actively participating in the program, late payment charges will not be imposed on CAP customers. Security deposits are also not imposed on CAP customers. In accordance with paragraph 65(a) of the 2025 UGI Gas Base Rate Case settlement, the Company does not collect security deposits for income verified low income customers up to 150% FPIG. Furthermore, for customers receiving a refund of their security deposit, if they are enrolled in autopay, the deposit will be returned to the customer by direct debit. If the customer is not enrolled in auto pay, then the deposit will be returned via check. The Company does not apply security deposits to a low income customer's account balance, unless the check gets returned as undeliverable, and as such it will not seek informed consent from the customer before applying a security deposit refund to a low income customer's account balance.

I. PARTICIPANT OBLIGATIONS

To remain eligible for participation in CAP, a customer must agree to (in writing) and perform the following obligations:

- Make the monthly CAP payments;

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- Conserve energy and, if eligible, participate in LIURP;
- Exceptions to LIURP participation as a requirement for CAP enrollment may be granted based on the conditions of the home, lack of landlord permission, or other extenuating circumstances;
- Provide access to the meter for an actual meter reading, if required;²⁸
- Participate in good faith and comply with all educational, assistance, social or governmental programs recommended by the Company or by the CBO;
- Report immediately to the CBO any change in family size or change in income;
- Comply with the recertification requirements; and
- Apply for any assistance grant for which he/she may be eligible.²⁹

To ensure fair treatment of all participants, however, UGI will administer the aforementioned obligations with sufficient flexibility to provide the assistance intended by the program. Therefore, UGI or CAP CBOs may agree to waive or modify one or more of the participant obligations in extraordinary circumstances.

J. PRE-PROGRAM ARREARAGE FORGIVENESS

UGI forgives a CAP customer's pre-program arrearage balance on a one thirty-sixth (1/36th) basis upon receipt of each timely and in-full CAP monthly payment. This practice provides immediate incentive for a CAP customer to continue the positive payment behavior. UGI also provides no less than a \$10.00 per month pre-program arrearage forgiveness. UGI applies arrearage forgiveness for each timely and in-full monthly payment, regardless of arrears, and retroactively for any months missed once those months are paid. For example, if a CAP customer is delinquent for three months of payments, and makes catch-up payments for two of those three months, the customer will receive forgiveness for those two months.

To be eligible for pre-program arrearage forgiveness, participants must maintain all program requirements in each month since enrolling in the program.

K. APPLICATION OF CAP CREDITS

Pursuant to 52 Pa. Code § 62.2 and UGI's effective tariffs, a CAP credit is set as the difference between the CAP customer's actual usage bill calculated at the standard residential rate and the CAP monthly bill. UGI applies CAP credits on a monthly basis upon issuance of the CAP

²⁸ CAP Credit and Pre-Program Arrearage forgiveness may be held up if an actual meter reading is not available.

²⁹ CAP participants are encouraged to apply for LIHEAP Cash or Crisis grants and direct them to UGI. However, CAP participants are not removed from CAP if they do not apply for these grants and do not direct them to UGI.

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bill.

UGI eliminated its per-customer maximum CAP credit since its 2014-2017 USECP. UGI's 2026-2030 USECP will likewise not have a per-person CAP credit maximum.

UGI institutes the following CAP control features to encourage energy conservation:

High Annual Usage at Enrollment: UGI uses the following thresholds to determine when a customer is considered to be a high usage customer. These thresholds were determined by identifying the top 5% of the highest usage customers and then utilizing that data to establish the respective annual high usage criteria for Gas and Electric customers.

Table 5. Customer Assistance Program (CAP) High Usage Criteria	
Division	High Usage
UGI Gas	1,787 ccf
UGI Electric	32,632 kwh

The following provisions apply to any customer who applies for CAP and any existing CAP customer with usage above these assigned thresholds:

- The customer must participate in an interview with the CAP caseworker. The CAP caseworker will review data specific to the customer's residence to determine potential reasons for the customer's high usage.
- The CAP caseworker will then conduct an energy education session.
- If applicable, referrals will be made for the LIURP program.
- If enrolled, high usage will continue to be monitored for additional outreach and referrals.

This high-usage evaluation will take place annually for existing CAP customers.

Removal from CAP

1. A CAP customer may be removed from CAP for refusing to participate in the LIURP program subject to the exceptions listed above in Section V.I.
2. A customer may be removed for failure to comply with these high usage controls.³⁰

³⁰ Exceptions may be granted where the factors giving rise to the customer's increased consumption are beyond the customer's reasonable control. Examples include customers who report additional household members, illness, or other contributing factors beyond their control.

L. RECERTIFICATION POLICY

1. CAP Recertification Requirements for LIHEAP and Non-LIHEAP Participants

Participants must provide evidence of continued program eligibility. The recertification process is a mandatory requirement in order to ensure proper participation and continued program eligibility.

CAP customers who have received LIHEAP and have opted in to DHS Data Sharing in the current or prior season will be automatically recertified. CAP customers who have received LIHEAP, but have not elected to share DHS data, are required to recertify for CAP annually. A customer will not be deemed ineligible for CAP on the basis of failure to participate in LIHEAP. Non-LIHEAP CAP customers who recertify annually for CAP will remain enrolled in CAP. To recertify the following provisions apply:

- In accordance with Paragraph 59(b) of the 2025 UGI Gas Base Rate Case Settlement, UGI Gas and UGI Electric will automatically recertify CAP customers who consent to sharing income by checking the LIHEAP data sharing box on the LIHEAP application. Additionally, the Company will waive the triennial CAP recertification requirement currently in effect for CAP customers who have received LIHEAP and are included on the LIHEAP data shared by DHS during the current or prior LIHEAP season. This auto recertification effort is contingent upon the DHS data sharing process being in effect.
- For Non-LIHEAP and Non-DHS Data Sharing Participants - Income documentation must be provided annually to verify that the participant's household income is at or below the current 150% of the FPIG.

Should the participant fail or refuse to recertify within two billing cycles of being notified to do so, UGI may remove the customer from CAP. UGI believes this practice encourages those participants who continue to have household incomes at or below 150% of the FPIG to complete the recertification process and, therefore, maintain affordable energy bills. The customer is responsible to reenroll in the program.

If a CAP customer is removed for failing to recertify and has missed CAP payments, the customer must satisfy missed CAP payments prior to being reinstated into CAP.

2. Recertification Reminder Schedule

UGI actively reminds CAP participants of their obligation to recertify income eligibility as per the following schedule:³¹

- A recertification notice letter is mailed a month prior to the anniversary date

³¹ See **Appendix E** for a schematic of UGI's recertification process.

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(recertification due date);

A contact from the CBO is made 15 days prior to the anniversary date;

- A reminder letter is mailed from the Company on the anniversary or on the recertification due date; and
- A contact from the CBO is made 1 month past the anniversary date.

A recertification letter is sent annually to CAP customers stating one of the following:

- Customer has been automatically recertified based on receipt of LIHEAP and participation in DHS data sharing in current or prior season; or
- Customer needs to complete the Common Application Form and submit with proof of income to their local CBO.

Once a customer completes recertification, the reminders set forth above will cease to the extent they have not yet been completed.

3. Use of Zero Income Statements for CAP Enrollment and Recertification

UGI customers who report zero household income at the time of CAP enrollment and recertification are required to complete a “Zero Income Form,” as set forth in **Appendix F**. The Zero Income Form need not be notarized. The Zero Income Form is part of the Common Application Form packet and must be filled out by the individual who holds the account with UGI. The following information is required for the Zero Income Form: (1) customer name; (2) an explanation of how household expenses were met for food and shelter during the applicable period. The Zero Income Form must be signed by the account holder. As stated on the form, by signing the Zero Income Form, the customer provides consent to UGI to verify income with government agencies. UGI CBOs have reported that use of the form does not hinder participation in the UGI universal service programs. Therefore, UGI will continue to use the Zero Income Form in conjunction with the Commission’s Common Application Form under the 2026-2030 USECP.

As outlined in the participant obligations, customers must report a change in household size or income. Specifically, for a customer who reports zero income, UGI will require the customer update their income (if they have not already done so) six months following the report of zero income.

4. Impact of Recertification

Appropriate changes in the percentage of income and/or average bill payment will be made upon completion of the recertification process. If income or average bill payment at the time of recertification dictates a change in the monthly payment, the new amount will be used for future monthly payments. Future bills issued upon completion of recertification will reflect an appropriate CAP bill amount, but past CAP bills issued are the customer’s responsibility to pay. During the recertification process, if a participant is deemed ineligible for continued participation in CAP, the customer will be notified that they are no longer eligible to participate and the reason(s)

why they are no longer eligible for CAP.

M. REASONS FOR REMOVAL FROM CAP

- Failure to make CAP payments that results in termination and the customer has not cured his/her payments within 109 days of termination;
- Failure to comply with any customer obligation set forth in the program;
- Failure to comply with the obligation of good faith, honesty, and fair dealing while working with the CAP CBO or UGI;
- Household income increases to greater than 150% of the FPIG;
- Failure to comply with established high usage controls;³²
- Refusal to participate in LIURP. Exception to LIURP participation may be granted based on the conditions of the home, lack of landlord permission or other extenuating circumstances;
- Any reason for which the customer's service may be terminated under Chapter 56 of the Commission's regulations or Chapter 14 of the Public Utility Code;
- Failure/refusal to recertify in CAP;
- Bankruptcy - at the time of the filing of bankruptcy, all receivable amounts that may include frozen pre-program arrearages will fall under the jurisdiction of the bankruptcy court and will no longer be eligible for CAP benefits; or
- Legal action - should UGI have reason to take legal action against a participant that encompasses any receivable owed it, all receivable amounts that may include pre-program arrearages will fall under the jurisdiction of the applicable court and will no longer be eligible for CAP benefits. Participants removed from the CAP will receive a written statement indicating the reason(s) for the dismissal. Customers defaulting and dropped from the CAP will be referred to the Company's Credit and Collection Department for further action, if necessary.

Any CAP participant may voluntarily request to be removed from the program. However, if a CAP participant requests to be removed from CAP for the reason that their seasonal usage bills total less than the monthly CAP amount ("seasonal short-term benefit"), or if the customer otherwise requests to be removed even though CAP benefits the customer, the customer will be removed from the program and will forfeit all program benefits. The customer will then be required to remain out of CAP for a period of 12 months, unless they pay the CAP catch-up amount, before they can re-apply for the program, provided that exceptions will be granted on a

³² Exceptions may be granted where the factors giving rise to the customer's increased consumption are beyond the customer's reasonable control. Examples include CAP customers who report additional household members, illness, or other contributing factors beyond their control.

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case-by-case basis based on demonstrated hardship. The customer will be mailed a letter to confirm the request to be voluntarily removed from CAP. UGI will accept the request for removal via phone with a UGI representative. If CAP is no longer a benefit to the customer and they choose to be removed, there is no twelve-month wait to re-apply.

UGI removes CAP participants when they voluntarily discontinue service and are no longer customers. All unpaid bills and unforgiven dollars are due upon the removal from CAP, as this is considered a broken payment arrangement.

UGI also reserves the right to remove any CAP customer if the program is deemed non-beneficial without having to receive the customer's consent.

N. CAP NON-PAYMENT DEFAULT AND CREDIT AND COLLECTION POLICIES

Customers who miss a CAP payment are provided two payment notifications prior to the Company initiating its termination procedures. After the customer's first missed payment, assuming the payment has not been made, the CAP CBO sends a notification to the customer at 15 days and 25 days after the missed payment. The 15-day notification may be a letter or telephone call. The 25-day notification is a mailed letter. Both the 15- and 25-day notifications advise the customer that their CAP payment is overdue.

Upon the customer's second missed CAP payment, UGI moves forward with the appropriate notifications and shut-off procedure and will send a termination notice stating the past-due amount. The customer will be required to pay the amount set forth in the termination notice, prior to the scheduled termination date to avoid shut-off. If the customer fails to pay per the terms of the termination notice, service is shut off.

When the service is shut off for non-payment, the terminated customer has up to 109 days to pay the full catch-up CAP amount, including any CAP bills that may have come due during the shut-off process, plus reconnection fees for Electric customers only. However, in accordance with Paragraph 64 of the 2025 UGI Gas Rate Case settlement, the Company does not assess reconnection fees for income verified Gas customers. Upon receipt of the full catch-up amount and the reconnection fee, if applicable the customer will be returned to CAP. If the terminated customer does not pay the full catch-up amount within 109 days, the customer will be removed from CAP and the customer will be responsible to make full payment of any outstanding balance and reconnections fees, if applicable, prior to the reconnection of service. Upon full payment and service restoration, the customer may then re-apply to enroll in CAP. One additional exception to the reinstatement policy would be when the customer's actual balance is less than the CAP balance.

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As stated above in the operation share section, awarded Operation Share Hardship Grant amounts can be used to pay for restoration fees, including reconnection fees, if applicable, to the extent of the awarded grant amount for customers or applicants who are income-qualified for the program, regardless of the customer's or applicant's prior or current enrollment in CAP.

O. REINSTATEMENT POLICY

Customers requesting reinstatement must comply with and agree to all applicable program eligibility requirements and customer obligations. As a condition of reinstatement, a customer must:

- Provide adequate assurance that the reason(s) for the prior default and resulting program dismissal have been removed or corrected; and
- Make up all missed CAP payments or full balance when appropriate before reinstatement.

As a condition of reinstatement, a customer may also be required, depending upon individual circumstances, to make an up-front payment. This upfront amount would represent the customer's missed CAP payments that would need to be satisfied prior to reinstatement. Upfront payments are most common for a customer that is looking to restore service and remain on CAP. A reconnection fee, if applicable, may be required as an upfront payment. Another scenario where an upfront payment is required is when it is a prerequisite for the customer's receipt of additional grants or program services.

If a customer voluntarily removes themselves from CAP for seasonal short-term benefit, the customer will not be eligible again until after a one-year waiting period. The customer, could, however, have their CAP reinstated before the year if they, at the time of their request, satisfy the CAP amount covering both the missed CAP payments while on CAP, and the month(s) they spent out of the program (i.e., CAP catch-up amount).

Finally, consistent with Paragraph 48(b) of the 2022 UGI Gas Rate Case Settlement, UGI Gas will continue to conduct outreach to active customers who have been removed from CAP due to failure to recertify. If these UGI Gas customers submit income documentation, they will be reenrolled, and any arrearage accrued will be included with their existing pre-program arrearages.

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VI. LIURP

A. INTRODUCTION

UGI's LIURP consists of a Weatherization Program.

B. FUNDING AND BUDGET

For the term of this 2026-2030 USECP, the LIURP budgets for UGI Gas and UGI Electric will increase commensurate with the residential percentage rate increase approved in any UGI Gas or UGI Electric base rate case that is adjudicated within the term of this 2026-2030 USECP. If there is not any applicable base rate case, the LIURP budgets will increase by 3% over the prior year budgets. Any unspent LIURP funds will carry over into the subsequent program year. See Table A-3 below for a breakdown of the division budgets.

C. LIURP ENROLLMENT LEVELS

The table shows the number of jobs completed per Company and the associated spending for the period of 2022 through 2024.

Table 6. Completed LIURP Jobs for 2022 - 2024		
Company	Number of Jobs	Cost
UGI South	812	\$6,389,229
UGI North	533	\$3,863,617
UGI Central	282	\$2,104,733
UGI Gas	1,627	\$12,357,579
UGI Electric	163	\$861,713
Total UGI Gas + Electric	1,790	\$13,219,292

D. LIURP REPORTING REQUIREMENTS

The Companies report all data required by the LIURP codebook.

E. LIURP WEATHERIZATION PROGRAM

The LIURP Weatherization Program is offered to reduce the energy consumption of low-income customers through the installation of energy conservation measures and energy conservation education. By reducing the energy consumption of these customers, the intent of LIURP is to reduce customer arrearage, collection and termination costs. The program places top priority on the health and safety of all LIURP participants.

Program services are provided free of charge to the customer. Upon verification of program eligibility by the LIURP agency, each LIURP heating customer will receive an on-site energy survey/audit. Energy saving measures for gas customers and electric space heat customers

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may include, but are not limited to, the following: insulation, furnace repair/replacement, water heater repair/replacement, furnace efficiency modification, windows and baseboard caulking, door and window weather stripping, door sweeps and thresholds, replacement of broken window panes, storm windows, attic ventilation, electrical outlet and switch plate gaskets on outside walls, water conservation measures, energy education, infiltration measures and incidental repairs (necessary to the effective performance of weatherization materials). Low cost energy saving measures for electric non-heating customers may include but are not limited to refrigerator replacement, high efficiency lighting, window air conditioner replacement and other measures necessary to the effective performance of weatherization materials within the job limit costs. Eligible UGI Electric and UGI Gas customers may receive in home or telephonic energy education sessions. An in home energy education session is conducted during the initial weatherization audit where the auditor provides customized conservation tips to the customer. A second energy education session takes place after the weatherization work has been completed. At this session, the auditor explains what work was completed and how it will make the customer's home more energy efficient. Telephonic sessions are utilized in circumstances where necessary members were not present for the second in home energy session. The contractor will have the customer complete an Energy Education Form, which will be retained for four years, and then the customer signs a certificate of completion form after measures are completed.

Energy saving measures installed will be those Commission-approved measures in the LIURP codebook. Job inspections are completed by a third-party agency. UGI evaluates LIURP jobs completed through October each year. Customer complaints and contractor issues, when identified, are tracked by UGI staff in a spreadsheet that contains all applicable details. When a complaint has been made, UGI staff contact the customer and CBO in an attempt to rectify the situation. Furthermore, the following protocols are adhered to:

- Post-installation inspection protocols include interviewing customers to assess satisfaction with the audit and installation process and identify any customer concerns and determining issues with installed measures;
- Customer complaints regarding a LIURP contractor will result in UGI sending a different contractor to remediate the work;
- If an installed program measure is not operating efficiently within a year of installation, the agency is required to return to the premises to remediate or complete the work;
- If a LIURP recipient's energy usage increases after the installation of program measures, UGI will investigate the cause on a case-by-case basis.

UGI Gas will maintain its per-job LIURP funding cap up to \$14,000 where furnace or

boiler replacement is necessary.³³ For LIURP jobs where gas furnace replacement is not necessary, the per job maximum will be \$10,000. In its June 4, 2026 Order, at Docket No. P-2025-3054381, the Commission approved UGI Gas’s petition to waive the LIURP cost-effectiveness standard at 52 Pa. Code § 58.11(a) and the high-use criteria at 52 Pa. Code § 58.10(a)(1) for customers needing furnace repair or replacement.

In situations where jobs need to be deferred due to health and safety reasons, customers will be notified (in writing) by either the Company or its CBO/LIURP Contractors. Examples of health and safety hazards include, but are not limited to, gas leaks, high carbon monoxide levels, combustion appliances not venting properly, mold, moisture, infestation, asbestos, and electrical issues. The Company will track the number of deferrals and associated reason on a monthly basis through its COS or similar reporting platform.

Customers that cannot have their home weatherized due to a deferral issue, will be referred by the CBO to agencies including but not limited to: the Pennsylvania Department of Community & Economic Development (“DCED”) Weatherization Assistance Program (“WAP”), county-specific whole home repair programs, or the Area Agency on Aging (“AAA”) for elderly customers.

1. Landlord Consent

UGI utilizes a landlord consent letter and eligibility affidavit waiver to get landlord consent for LIURP. LIURP agencies and contractors obtain and store this documentation for four years. UGI clarifies that there is no documentation to indicate denial by the landlord, but agencies and contractors note the job rejection in COS. UGI does not accept any method of landlord consent other than in writing, and customers applying for LIURP must sign an eligibility affidavit waiver with the application. There will be no referrals or measures provided to an eligible tenant if a landlord refuses to give consent.

2. Weatherization Program Administration

Refer to **Appendix D** for the CBOs currently contracted for the provision of energy survey and measure installation. Per Paragraph 59(a) of the 2023 UGI Electric Rate Case Settlement, UGI Electric contracted with Agency for Community Empowerment of NEPA in December 2023 based on their capability to perform 20 additional baseload and 10 additional heating jobs annually, beginning February 1, 2024. UGI Electric intends to renew this contract annually subject to continued performance in conformance with the Company’s USECP rules and its contract with the Company. In addition, UGI engages a third-party to independently verify that home

³³ Consistent with Paragraph 44(b) of the 2022 UGI Gas Rate Case Settlement, UGI Gas increased its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary.

weatherization was completed in accordance with LIURP standards.

3. Weatherization Program Eligibility

See the CAP Identification for CAP Eligibility section below for identification requirements applicable to the LIURP program. To be eligible for the LIURP Weatherization Program, the customer must be able to demonstrate the following:³⁴

- The customer is an active residential gas heating customer or residential electric customer;³⁵
- The customer's gross household income is at or below the current 150% of the FPIG;³⁶
- The customer's gross household income is between 151 and 200% of the FPIG, pursuant to the Household Income Documents provisions set forth in the CAP sections;
- Special needs customers are identified consistent with the Commission's definition in the LIURP regulations - A customer with household income between 151% and 200% of the FPIG and that one or more household members meet any of the following criteria:
 - Are age 62 and over or age five and under.
 - Have a disability.
 - Are under a protection from abuse order or other court order that contains clear evidence of domestic violence.
- Also, for UGI Electric customers between 151% and 200% of the FPIG, a limit of 20% of the overall UGI Electric LIURP budget shall apply for jobs related to UGI Electric customers falling between 151% and 200% of the FPIG.³⁷
- The customer's annual consumption is above average usage, which is defined as a customer who exceeded the average residential threshold by 25% for electric customers (baseload and heat) and 30% for natural gas customers (note: the threshold will be reviewed annually to consider significant changes in usage patterns);

³⁴ UGI retains the right to grant exceptions to LIURP eligibility requirements for customers who do not meet the usage requirement due to broken heating equipment. Other situations may include but are not limited to, premises with occupants over age 62 or under age 5, customers with disability, or those who exceed the usage threshold but do not have twelve months of consecutive service.

³⁵ UGI Gas will waive the requirement that the customer be an active gas heating customer for the purpose of furnace repair or replacement spending.

³⁶ However, up to 20% of LIURP budget may be provided to participants with a household income at 151-200% of the FPIG, on a first-come, first-serve basis.

³⁷ See Paragraph 59(b) of UGI Electric's 2023 Rate Case Settlement.

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Table 7. Minimum Usage Criteria - LIURP	
Division	High Usage
UGI Gas – Heating	877 ccf
UGI Electric - Heating	12,788 kWh
UGI Electric – General	6,000 kWh

- The customer has had continuous service for 12 months;
- The customer’s premises is suitable for weatherization services;³⁸
- The customer’s premises is the customer’s primary residence;³⁹ and
- The premises has not received LIURP weatherization services for the past seven (7) years.⁴⁰

Residential accounts with the following indicators are not eligible for the LIURP Weatherization Program:

- Health care facilities;
- Landlord/tenant (account is in the landlord’s name);
- Ratepayer/occupant (the ratepayer does not reside at the property);
- Foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner’s name);
- Utility service used to operate a swimming pool; and
- A residential property where more than 50% of the anticipated gas usage served through a single meter is used to operate the business.

4. Weatherization Program Outreach and Intake Efforts

UGI is in regular contact with weatherization CBOs, local government, weatherization providers, and any other appropriate agencies for input and advice on the most efficient and effective methods to provide LIURP weatherization services without duplication or exclusion. Through the use of local CBOs, such as LIURP providers found in **Appendix D**, integration of

³⁸ Program measures follow applicable payback periods; therefore, a customer’s residence that has been previously weatherized may not be eligible for LIURP until the applicable payback period has expired. Exceptions to the applicable payback period include, but are not limited to, addressing customer satisfaction or other issues with installed measures identified within twelve months of the weatherization date.

³⁹ The program is available to both homeowners and renters. Renters can qualify with written permission from landlords.

⁴⁰ Exceptions to the seven-year timeframe may be granted in circumstances including, but not limited to, addressing customer satisfaction or other issues with installed measures identified within twelve months of the weatherization date.

federal, state, and local funds for LIURP weatherization, participants are more easily accomplished. UGI provides conservation education packets to its CAP and LIURP CBOs for distribution to customers. UGI will inform each LIURP weatherization participant of any and all appropriate services.

5. Weatherization Program Identification & Referral of Low-Income Customers

With the use of COS for the administration of LIURP, UGI reviews its customer records to identify high usage, high arrearage, low-income customers. In addition, UGI accepts referrals from CBOs, community groups, and customer inquiries. LIURP referrals may also come from UGI's Energy Efficiency and Conservation Plan program management.

6. Weatherization Contractor Credentials and Training

UGI requires that all contractors maintain valid Building Performance Institute ("BPI") credentials and adhere to all terms and conditions outlined in work authorization agreements and/or contracts undertaken with UGI.

Regarding training, the Company intends to facilitate annual contractor training, where topics may include but are not limited to blower door testing, air sealing and insulation procedures, and fundamentals of building science. This training will be conducted either by webinar or in person. For instances when the Company determines that in person training would be the most applicable, the location will be determined by UGI and may vary from year to year.

7. Weatherization Program Inter-Utility Coordination

UGI maintains contact with appropriate gas and electric utilities within their service territories to initiate inter-utility coordination with both NGDCs and EDCs when applicable.⁴¹ UGI and the other utilities coordinate comprehensive program services to better serve LIURP weatherization customers. In many cases, UGI and the corresponding utility employ the same LIURP measure installer. Therefore, inter-utility coordination may be accomplished without the need for written contract or inter-utility billing. As previously stated in the CAP section, UGI will form a USAC that will hold at least two annual meetings. UGI will include the electric utilities that overlap its gas service territory to these meetings to continue to discuss the coordination of the provision of LIURP services, and particularly, to improve identification of customers with inoperable natural gas furnaces who may be using electricity for space heating so as to improve the provision of LIURP services for those customers.

F. REHABILITATION PROGRAM

Through the Rehabilitation Program, UGI funds the installation of energy efficient measures at the time of construction or rehabilitation of low-income residential housing. These

⁴¹ UGI restates its commitment to coordinating with EDCs in overlapping service territories who may be providing similar services pursuant to Act 129.

measures include the installation of ENERGY STAR rated high efficiency natural gas furnaces, hot water heaters, upgraded installation, and energy efficient windows.

The Rehabilitation Program achieves usage reduction by: (1) allowing identified low-income and special needs customers to benefit from a variety of energy efficient measures which will avoid future high usage, and (2) maximizing the LIURP dollars spent on installed weatherization measures. Specifically, this program treats low income housing at the construction/rehabilitation phase in order to maximize material and labor dollars. The expectation is that these homes could eventually receive LIURP services. Therefore, through this program, these customers receive service at the construction/rehabilitation phase to assist in covering the costs of the project(s) and to avoid future high usage and arrearage problems. By implementing energy efficiency measures at the rehabilitation or construction phase, the overall cost of the measures can be more economical than implementing them after the construction is complete. UGI periodically joins forces with rehabilitation projects within its service area to assure energy efficiency in low income housing.

1. Rehabilitation Program Eligibility

Each Rehabilitation Program project must have the following criteria to qualify for LIURP services and/or funds:

- The customer is an active residential gas heating customer or residential electric customer;
- Customer can be a homeowner or renter;
- The customer's premises is the customer's primary residence;
- The customer's gross household income is at or below the current 200% of the FPIG;
- Existing gas heat or electric heating customer; and
- Coordination with a CBO(s).

Possible CBOs that would become involved in this project include:

- Neighborhood Housing Services;
- Habitat for Humanity;
- Housing Authorities; and
- Community Development Offices.

Residential accounts with the following indicators are not eligible for the LIURP Rehabilitation Program:

- Health care facilities;
- Landlord/tenant (account is in the landlord's name);
- Ratepayer/occupant (the ratepayer does not reside at the property);
- Foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner's name);

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- Utility service used to operate a swimming pool; and
- A residential property where more than 50% of the anticipated gas usage served through a single meter is used to operate the business.

Information will be collected, including number of homeowners served and renters served, and will be reported pursuant to the universal service reporting requirements at 52 Pa. Code §§ 62.5(a)(2)(ii)(A)(I)-(II) and 54.75(2)(ii)(A)(I)-(II), which require public utilities to report LIURP data as established in 52 Pa. Code § 58.15a.

UGI will reserve up to 10% of its total current year LIURP budget for Rehabilitation Project Funding. If the entire budgeted amount is not expended, the remainder will be returned to traditional LIURP services funding.

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APPENDIX A

Funding Levels for each Universal Service Program

I. UGI Projected Participation and Budget Per Program

Projected participation and budgets for USECP programs are set forth below. For LIURP and Operation Share, participation and budget figures are provided for the geographic footprints of the UGI Gas Division's former three rate districts consistent with Paragraph 38 of the 2019 UGI Gas Rate Case Settlement.

A. CAP

1. UGI Gas

UGI Gas's projected participation levels and budget for CAP are shown below:

Table A-1. UGI Gas CAP Annual Participation Levels & Budget for 2026 - 2030		
Year	Projected Participation Levels	Projected Budget
2026	26,695	\$23,486,391
2027	27,871	\$24,520,570
2028	29,098	\$25,600,287
2029	30,379	\$26,727,547
2030	31,717	\$27,904,444

2. UGI Electric

UGI Electric's projected participation levels and budget for CAP are shown below:

Table A-2. UGI Electric CAP Annual Participation Levels & Budget for 2026 - 2030		
Year	Projected Participation Levels	Projected Budget
2026	5,043	\$8,852,945
2027	5,256	\$9,226,504
2028	5,478	\$9,615,826
2029	5,709	\$10,021,576
2030	5,950	\$10,444,446

B. LIURP

The projected LIURP participation levels and budgets for the geographic footprint of the former UGI Gas rate districts and the UGI Electric service territory are set forth in Table A-3. The LIURP budgets for UGI Gas and UGI Electric will increase commensurate with the residential percentage rate increase approved in any UGI Gas or UGI Electric base rate case that is adjudicated within the term of this 2026-2030 USECP. If there is not any applicable base rate case, the LIURP budgets will increase by 3% over the prior year budgets. Unspent LIURP funds will carry over into the subsequent program year budget.

In accordance with Paragraph 60(e) of the 2025 UGI Gas Base Rate Case settlement, the Company is permitted to increase the annual budget reallocation limitation across the geographic footprint of its former rate three rate districts from 5% to 50% in the event that certain agencies

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are underspent, and their budgets could be better utilized in other areas. If any reallocation of funds from one of the former three rate districts to another exceeds 25%, UGI Gas will file a letter with the Commission at its USECP dockets explaining the reason for the reallocation. Additionally, the Company will engage with LIURP agencies to actively monitor funding levels and make determinations regarding the reallocation of funds.

Table A-3. LIURP Participation Levels & Budget 2026 – 2030		
Geographic Area	Projected Participation Levels	Projected Budget⁴²
South	283	\$2,556,069
North	222	\$1,752,154
Central	95	\$906,127
UGI Electric	94	\$403,679

C. Operation Share Hardship

Table A-4. UGI Operation Share Company Annual Funding Level for 2026 - 2030⁴³	
Geographic Area	Initial Company Contribution
South	\$576,112
North	\$329,339
Central	\$179,049
Total Gas	\$1,084,500
Electric	\$117,423
Total Gas + Electric	\$1,201,923

Table A-5. UGI Operation Share Annual Costs by Geographic Area for 2026 - 2030

Geographic Area	Projected Participation Levels	Initial Company Contribution	Projected Cash Donations	Total Donations	Projected Administrative Budget
South	1,898	\$576,112	\$64,587	\$640,699	\$28,468
North	997	\$329,339	\$10,200	\$339,539	\$14,952
Central	513	\$179,049	\$7,100	\$186,149	\$7,694
Electric	394	\$117,423	\$5,600	\$123,023	\$5,907

UGI proposes to allocate available funds to administering agencies, based on the 2018 Census Data, as updated in 2022, and the Commission’s estimate of the number of residents under 150% of the FPIG, as shown in Table A-6. In accordance with Paragraph 62(b) of the 2025 UGI Gas Base Rate Case settlement, the Company is permitted to increase the annual budget reallocation limitation across the geographic footprint of its former rate three rate districts from 5% to 50% in

⁴² UGI will reserve up to 10% of its total annual LIURP budget for Rehabilitation Project Funding. If the entire budgeted amount is not expended, the remainder will be returned to traditional LIURP services funding.

⁴³ As part of the Company’s 2026 Gas and Electric Rate Cases at Docket Numbers R-2025-3059523 and R-2025-3059430, the Company has proposed to increase its Operation Share budget to \$1,000,000 per year for UGI Gas and \$150,000 per year for UGI Electric for 2027-2029 regardless of the outcome of these cases.

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the event that certain agencies are underspent, and their budgets could be better utilized in other areas. If any reallocation of funds from one of the former three rate districts to another exceeds 25%, UGI Gas will file a letter with the Commission at its USECP docket explaining the reason for the reallocation. The Company will engage with the agencies below to actively monitor funding levels and make determinations regarding the reallocation of funds.

Table A-6. UGI Allocations by Geographic Area		
Geographic Area	Agency	Inter-Area Funding Allocation
UGI South	Allentown Salvation Army	15%
	Bethlehem Salvation Army	7%
	Easton Area Neighborhood Center	7%
	Harrisburg Salvation Army	23%
	Hazleton Commission on Economic Opportunity	4%
	Lancaster Community Action Program	17%
	Lebanon Christian Ministries	6%
	Reading Salvation Army	11%
	NHS	10%
North	AGAPE	6%
	Commission on Economic Opportunity	38%
	Scranton Salvation Army	36%
	S.T.E.P., Inc.	11%
	TREHAB, Inc.	2%
	Union-Snyder Community Action Agency	7%
Central	Central PA Community Action	7%
	Central Susquehanna Opportunities	11%
	Commission on Economic Opportunity	10%
	East Stroudsburg Salvation Army	6%
	Hamburg Salvation Army	21%
	Northern Tier Community Action Corp	15%
	Schuylkill County Community Action	4%
	S.T.E.P., Inc.	2%
	TREHAB, Inc.	23%
	Union-Snyder Community Action Agency	1%

D. CARES

UGI Gas's projected participation levels and budget for CARES Outreach are shown below:

Table A-7. UGI Gas CARES Participation Levels & Budget 2026-2030	
Projected Participation Levels	Projected Budget
1,100	\$115,000

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UGI Electric's projected participation levels and budget for CARES is shown below:

Table A-8. UGI Electric CARES Participation Levels & Budget 2020-2025	
Projected Participation Levels	Projected Budget
20	\$20,000

II. UGI Rider USP

In accordance with the Company's Gas Tariff⁴⁴ and Electric Tariff⁴⁵ available at <https://www.ugi.com/tariffs/>, UGI is permitted to recover costs for the USECP under its USP Riders with an annual reconciliation for costs and recoveries. The Rider USP rate shall be calculated to recover costs for the following programs: LIURP; CAP; Hardship Funds; and any other replacement or Commission-mandated USP or low-income program that is implemented during the period that the Riders are in effect.

⁴⁴ UGI Gas – Pa. P.U.C. No. 7.

⁴⁵ UGI Electric Pa. P.U.C. No. 6.

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APPENDIX B

PROJECTED NEEDS ASSESSMENT

Per 52 Pa. Code § 62.4(b)(3), NGDCs with more than 100,000 residential accounts are required to provide a projected needs assessment for each Universal Service Program component and provide an explanation of how each program component responds to one or more identified needs. UGI Electric is not required to conduct a projected needs assessment since it serves approximately 62,000 residential accounts, as per 52 Pa. Code § 54.77, however, the Company has performed the assessment and included it below.

The UGI Gas and UGI Electric needs assessments for this Plan, were based on the 2019-2023 census data. Tables B-1 and B-2 below include the number of estimated and identified low-income customers, the number of estimated and identified payment-troubled, low-income customers, the number of customers still needing LIURP services and the cost to serve them and the enrollment size of CAP to serve all eligible customers.

Table B-1 Projected Needs Assessment UGI Gas			
	Under 150% FPIG	151-200% FPIG	Total Gas
1. Number of Identified Low-Income Customers	68,867	11,726	80,593
2. Estimate of Number of Low-Income Customers	143,404	58,880	202,284
3. Number of Identified Payment-Troubled Low-Income Customers	7,258	57	7,315
4. Number of Customers in Need of LIURP Services	27,704	5,043	32,747
5. Cost of Serving the Number of Customers in Need of LIURP Services	\$200,826,296	\$36,556,707	\$237,383,003
6. Enrollment Size of CAP to Serve All Eligible Customers	68,867	N/A	68,867

Table 1	0-150% FPIG	151-200% FPIG	Total
12 Months Consecutive Usage	51,754	10,017	61,771
Over 877 ccf	30,246	5,223	35,469
Over 877 ccf Not Weatherized in Last 7 Years	27,704	5,043	32,747
Over 877 ccf Weatherized in Last 7 Years	2,542	180	2,722
Under 877 ccf	21,508	4,794	26,302

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Table 2	0-150% FPIG	151-200% FPIG	Total
Less Than 12 Months Consecutive Usage	13,963	1,321	15,284
Over 877 ccf	4,390	165	4,555
Over 877 ccf Not Weatherized in Last 7 Years	4,306	164	4,470
Over 877 ccf Weatherized in Last 7 Years	84	1	85
Under 877	9,573	1,156	10,729

Table B-2 Projected Needs Assessment UGI Electric	
	Total Electric
1. Number of Identified Low-Income Customers	6,251
2. Estimate of Number of Low-Income Customers	16,469
3. Number of Identified Payment-Troubled Low-Income Customers	253
4a. Number of Customers in Need of LIURP Services - Heating	676
4b. Number of Customers in Need of LIURP Services - Baseload	2,329
4c. Total Number of Customers in Need of LIURP Services	3,005
5a. Cost of Serving the Number of Customers in Need of LIURP Services - Heating	\$4,298,557
5b. Cost of Serving the Number of Customers in Need of LIURP Services - Baseload	\$4,860,078
5c. Total Cost of Serving the Number of Customers in Need of LIURP Services	\$9,158,635
6. Enrollment Size of CAP to Serve All Eligible Customers	6,251

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APPENDIX C

CAP Community Based Organizations

Agency	Communication Methods	Areas Served
AGAPE	Email, Mail, Phone	South
Agency for Community EmPOWERment of NEPA/ACE	Email, Mail, Phone	North
Allentown Salvation Army	Email, Mail, Phone	South
Central PA Community Action	Email, Mail, Phone	Central
Central Susquehanna Opportunities	Email, Mail, Phone	Central
Commission on Economic Opportunity	Email, Mail, Phone	All Gas & Electric
Community Action Partnership of Lancaster County	Email, Mail, Phone	South
East Stroudsburg Salvation Army	Email, Mail, Phone	Central
Easton Area Neighborhood Center	Email, Mail, Phone	South
Hamburg Salvation Army	Email, Mail, Phone	Central
Harrisburg Salvation Army	Email, Mail, Phone	South
Lebanon County Christian Ministries	Email, Mail, Phone	South
Neighborhood Housing Services of Greater Berks	Email, Mail, Phone	South
Northern Tier Community Action Corp	Email, Mail, Phone	Central
Reading Salvation Army	Email, Mail, Phone	South
S.T.E.P., Inc.	Email, Mail, Phone	Central, North
Schuylkill County Community Action	Email, Mail, Phone	Central
TREHAB	Email, Mail, Phone	Central
Union Snyder Community Action Agency	Email, Mail, Phone	Central, North

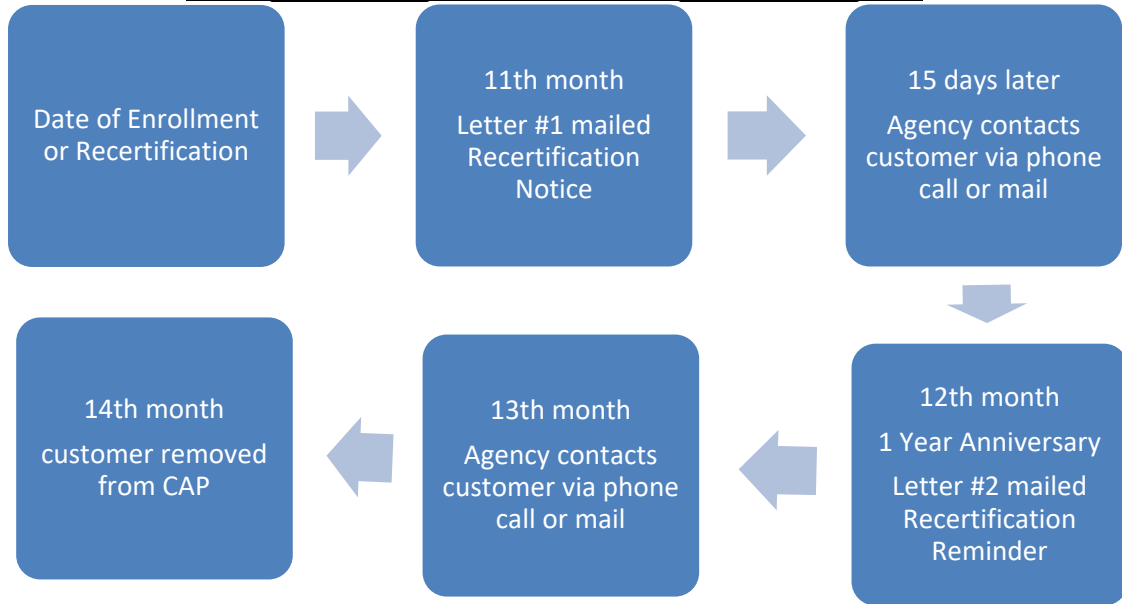
APPENDIX D

LIURP AGENCIES

Table D-1		
CBO	City	Geographic Area
Advanced Efficiency Worx	York	South
Agency for Community Empowerment of NEPA	Scranton	North, South, Electric
Berks Community Action Program	Reading	South
Carbon County Action Committee for Human Services	Lehighton	Central
Central PA Community Action	Clearfield	Central
CLEAResult	Scotrun, York	South, Central, North
Commission on Economic Opportunity	Kingston	South, North, Electric
Community Action Committee of the Lehigh Valley and Central PA	Bethlehem	South
Green Kite	Gratz	South, Central
Harron's Insulation and Ceilings	Temple	South
Northern Tier Community Action	Emporium	Central
South Central Community Action Program	Gettysburg	South
SOLAIRE, Inc.	Canton	Electric
SEDA-COG	Lewisburg	North, Central, Electric
York Home Performance	Glen Rock	South

APPENDIX E

Notification Schedule for CAP Recertification Process



APPENDIX F

Common Application Form and Zero Income Form

Pennsylvania Utility Assistance Application Form



By selecting my utilities below, I understand I am consenting to share my information with them for the limited purpose of helping me enroll and/or recertify in utility assistance programs that I qualify for. I understand these utilities may need to contact me for additional information before determining my eligibility for their assistance programs.

Note: UGI is unable to share your information with the utilities listed below. You should contact your other utilities directly to discuss available assistance program options and how to apply. If you do not see your utilities listed below, please contact them directly to find out if they offer any assistance.

Please select the utilities that provide your electric, water, and natural gas:

Electric	Water/Wastewater	Natural Gas
☐ Duquesne	☐ Light Aqua	☐ Columbia Gas
☐ Met-Ed	☐ PA American Water	☐ National Fuel Gas
☐ PECO-Electric	☐ Pittsburgh Water and Sewer Authority	☐ PECO-Gas
☐ Penelec	☐ Veolia	☐ Peoples Natural Gas
☐ Penn Power	☐ YorkWater	☐ Peoples Gas LLC
☐ PPL		☐ Philadelphia Gas Works
☐ West Penn Power		☐ UGI Gas
☐ UGI Electric		

Do you currently have an alternate supplier for your energy (also known as Choice or Shopping)? ☐ YES* ☐ NO

*In Pennsylvania, you can choose to contract with a supplier other than your local utility company for energy through the Choice program. If you checked "YES" that you currently have an alternate supplier and you want to enroll in the UGI Customer Assistance Program (CAP), you must contact your supplier directly within 45 days to cancel your Choice contract. Be aware that your supplier may charge you cancellation or other fees to end your Choice contract early. Please contact your supplier directly for details about ending your Choice contract. After you cancel the supplier contract, you will automatically return to default service from UGI.

**I affirm that all information on this application is true and complete to the best of my knowledge.
I am aware that I can be penalized for making false statements.**

Signature: _____

Date: _____

ATTENTION: This is an important notice! For information in your language, call 800-276-2722 or visit www.ugi.com/assistance-programs

UGI 2026-2030 USECP

APPENDIX F

Pennsylvania Utility Assistance Application Form



If one or more of your utility services are currently off, please identify which ones:

☐ Electric ☐ Water ☐ Natural Gas ☐ Wastewater

If you have a shut off notice from one or more utilities, please identify which ones:

☐ Electric ☐ Water ☐ Natural Gas ☐ Wastewater

Please contact your utility immediately if your service is off or in threat of termination—additional assistance may be available.

Name of Applicant (First Name, Middle Initial, Last Name)	Email Address
Service Address (ex. Number and Street, Apt #, City, State, Zip)	
Mailing Address – if different from Service Address	
Home Phone Number	Cell Phone Number

(Optional) UGI Account Number(s): _____

(Optional) Do you rent your home? ☐ Yes ☐ No

Total number of household occupants, including you - Adults (age 18 and over) :	Children:
--	------------------

Please provide the following information for all members of the household (adults and children), including you :

First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)
First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)
First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)
First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)
First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)
First Name, Middle Initial, Last Name	Birth Date (mm/dd/yyyy)	Before-Tax Income	Income Source(s)

If there are additional members in your household, please include their information on a separate sheet of paper.
If no adults in your household have income, please complete and sign the attached zero-income statement.

APPENDIX F

Pennsylvania Utility Assistance Application Form



By selecting my utilities below, I understand I am consenting to share my information with them for the limited purpose of helping me enroll and/or recertify in utility assistance programs that I qualify for. I understand these utilities may need to contact me for additional information before determining my eligibility for their assistance programs.

Note: UGI is unable to share your information with the utilities listed below. You should contact your other utilities directly to discuss available assistance program options and how to apply. If you do not see your utilities listed below, please contact them directly to find out if they offer any assistance.

Please select the utilities that provide your electric, water, and natural gas:

Electric	Water/Wastewater	Natural Gas
☐ Duquesne	☐ Light Aqua	☐ Columbia Gas
☐ Met-Ed	☐ PA American Water	☐ National Fuel Gas
☐ PECO-Electric	☐ Pittsburgh Water and Sewer Authority	☐ PECO-Gas
☐ Penelec	☐ Veolia	☐ Peoples Natural Gas
☐ Penn Power	☐ YorkWater	☐ Peoples Gas LLC
☐ PPL		☐ Philadelphia Gas Works
☐ West Penn Power		☐ UGI Gas
☐ UGI Electric		

Do you currently have an alternate supplier for your energy (also known as Choice or Shopping)? ☐ YES* ☐ NO

*In Pennsylvania, you can choose to contract with a supplier other than your local utility company for energy through the Choice program. If you checked "YES" that you currently have an alternate supplier and you want to enroll in the UGI Customer Assistance Program (CAP), you must contact your supplier directly within 45 days to cancel your Choice contract. Be aware that your supplier may charge you cancellation or other fees to end your Choice contract early. Please contact your supplier directly for details about ending your Choice contract. After you cancel the supplier contract, you will automatically return to default service from UGI.

**I affirm that all information on this application is true and complete to the best of my knowledge.
I am aware that I can be penalized for making false statements.**

Signature: _____

Date: _____

ATTENTION: This is an important notice! For information in your language, call 800-276-2722 or visit www.ugi.com/assistance-programs

APPENDIX F

Formulario de solicitud de asistencia para servicios públicos de Pensilvania



Al seleccionar mis servicios públicos a continuación, comprendo que doy mi consentimiento para compartir mi información con ellos con el propósito limitado de ayudarme a inscribirme y/o recertificarme en los programas de asistencia de servicios públicos para los que califico. Entiendo que estas empresas de servicios públicos pueden necesitar comunicarse conmigo para obtener información adicional antes de determinar mi elegibilidad para sus programas de asistencia.

Nota: UGI no puede compartir su información con las empresas de servicios públicos que se enumeran a continuación. Debe comunicarse directamente con sus otras compañías de servicios públicos para hablar sobre las opciones de programas de asistencia disponibles y cómo solicitarlas. Si no ve sus servicios públicos enumerados a continuación, comuníquese con ellos directamente para averiguar si ofrecen alguna ayuda.

Seleccione las empresas de servicios públicos que le proporcionan electricidad, agua y gas natural:

Electricidad	Agua/Aguas residuales	Gas natural
☐ Duquesne	☐ Light Aqua	☐ Columbia Gas
☐ Met-Ed	☐ PA American Water	☐ National Fuel Gas
☐ PECO-Electric	☐ Pittsburgh Water and Sewer Authority	☐ PECO-Gas
☐ Penelec	☐ Veolia	☐ Peoples Natural Gas
☐ Penn Power	☐ York Water	☐ Peoples Gas LLC
☐ PPL		☐ Philadelphia Gas Works
☐ West Penn Power		☐ UGI Gas
☐ UGI Electric		

¿Tiene actualmente un proveedor alternativo para su energía (también conocido como Choice o Shopping)? ☐ Sí* ☐ NO

*En Pensilvania, puede optar por contratar un proveedor de energía distinto a su compañía de servicios local a través del programa Choice. Si marcó que "Sí" tiene actualmente un proveedor alternativo y desea inscribirse en el Programa de Asistencia al Cliente (Customer Assistance Program, CAP) de UGI, debe comunicarse directamente con su proveedor dentro de los 45 días para cancelar su contrato Choice. Tenga en cuenta que su proveedor puede cobrarle cargos por cancelación u otros cargos por finalizar su contrato Choice antes de tiempo. Comuníquese directamente con su proveedor para obtener detalles sobre cómo finalizar su contrato Choice. Después de cancelar el contrato con el proveedor, volverá automáticamente al servicio predeterminado de UGI.

Afirmo que toda la información contenida en esta solicitud es verdadera y completa según mi leal saber y entender. Soy consciente de que puedo ser penalizado por hacer declaraciones falsas.

Firma: _____

Fecha: _____

ATENCIÓN: ¡Este es un aviso importante! Para obtener información en su idioma, llame al 800-276-2722 o visite www.ugi.com/assistance-programs

APPENDIX F

Formulario de solicitud de asistencia para servicios públicos de Pensilvania



Si uno o más de sus servicios públicos se encuentran actualmente suspendidos, identifique cuáles:

☐ Electricidad ☐ Agua ☐ Gas natural ☐ Aguas residuales

Si tiene un aviso de suspensión de uno o más servicios públicos, identifique cuáles:

☐ Electricidad ☐ Agua ☐ Gas natural ☐ Aguas residuales

Comuníquese con su empresa de servicios públicos de inmediato si su servicio está interrumpido o en peligro de ser interrumpido; es posible que haya asistencia adicional disponible.

Nombre del solicitante (Nombre, inicial del 2.º nombre, apellido)	Dirección de correo electrónico
Dirección de servicio (ej. Número y calle, apto., ciudad, estado, código postal)	
Dirección postal (si es diferente de la dirección de servicio)	
Número de teléfono fijo	Número de teléfono celular

(Opcional) **Número(s) de cuenta UGI:** _____

(Opcional) ¿Alquila su casa? ☐ Sí ☐ No

Cantidad total de ocupantes del hogar, incluido usted - Adultos (18 años o más):	Niños:
---	---------------

Proporcione la siguiente información para todos los miembros del hogar (adultos y niños), incluido usted:

Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos
Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos
Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos
Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos
Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos
Nombre, inicial del 2.º nombre, apellido	Fecha de nacimiento (mm/dd/aaaa)	Ingresos antes de impuestos	Fuente(s) de ingresos

Si hay miembros adicionales en su hogar, incluya su información en una hoja de papel aparte.

Si ningún adulto en su hogar tiene ingresos, complete y firme la declaración de ingresos cero adjunta.

UGI 2026-2030 USECP

APPENDIX G

CAP Audit Scorecard

CAP CBO AUDIT FORM

Note: This is an online form that CAP administrators complete for each account audited. The results are then used to create a scorecard for each CAP Community Based Organization (CBO). A sample of the scorecard sent to the CAP CBO is shown below.

1. Account Number * Enter your answer	11. Documentation on Account * ☐ Needed, Added ☐ Needed, Not Added ☐ Not Needed
2. Region * ☐ Central ☐ Electric ☐ North ☐ South	12. Does information in COS, including proof of income, match information provided on applications? * ☐ Yes ☐ No
3. Agency Name *	13. Complies with record retention policy (4 years per agency training manual) * ☐ Yes ☐ No
4. Type of audit / review * ☐ Enrollment ☐ Recertification	14. High Usage Questionnaire * ☐ Needed, Completed ☐ Needed, Not Completed ☐ Not Needed
5. Application / Intake Form Completed * ☐ Yes ☐ No	15. Zero Income Form * ☐ Needed, Completed ☐ Needed, Not Completed ☐ Not Needed
6. Consent Statement Signed * ☐ Yes ☐ No	16. Comments for Agency / Auditor * Enter your answer
7. Truth Statement Signed * ☐ Yes ☐ No	17. Auditor Name *
8. Proof of Income * ☐ Yes (producing LIHEAP receipt) ☐ No	
9. Was LIHEAP Received On Account * ☐ Yes ☐ No	
10. Proof of ID * ☐ Provided, Valid ☐ Provided, Not Valid ☐ Not Provided	

SAMPLE SCORECARD

Row labels represent last 6 digits of account number to protect PII.

Agency Name

Row Labels	Sum of Total Points	Average of Score
025252	10	100%
062401	10	100%
469252	10	100%
632825	10	100%
Grand Total	40	100%

UGI 2026-2030 USECP

APPENDIX H CAP “opt-in” Solicitation Communications

Customer Name
Customer Mailing Address
Customer Mailing Address

Dear Customer Name,

Our records indicate you have received a LIHEAP grant during the 2025-2026 LIHEAP season and have elected to share your household's income data with UGI. Based on this information, you qualify for enrollment* in the UGI Customer Assistance Program (CAP) for account XXXXXXXXXXXX. Enrollment in the CAP Program will assist you in managing your monthly energy bill, is free and has no impact on your credit score.

If you are interested in enrolling in CAP, you can:

- Email assistance@ugi.com and include this information: “Yes, I want to enroll account number XXXXXXXXXXXX into the Customer Assistance Program.”
- Check the box at the bottom of this letter and mail this letter back to UGI, Attn: Outreach CAP Enrollment, PO Box 13009, Reading, PA 19612-3009.
- Contact us at (800) 276-2722 from Monday through Friday from 8 am to 5 pm and the representative can enroll you in CAP over the phone.
- Income information from your LIHEAP application will be used to enroll you into the Customer Assistance Program (CAP).

Benefits of CAP

- A personalized monthly payment based on income or average bill.
- Past due debt forgiveness with timely and in full monthly payments.
- The potential for additional forgiveness while in the program, including the difference between your CAP payment and the actual usage bill.

To learn more about CAP, visit www.ugi.com/CAP. If you have recently enrolled in CAP, you can disregard this letter.

Thank you for being a customer of UGI.

UGI Utilities

- ☐ Yes, I want to be enrolled in CAP. I understand income information from my LIHEAP application will be used to process the enrollment. By checking this box, you are indicating you are authorized to make decisions about your UGI account.

**Account classifications that are not eligible for CAP are health care facilities; landlord/tenant; ratepayer/occupant; foreign load (one-meter supplies more than one unit); and natural gas/electric customers with an alternate supplier.*

APPENDIX H

Hello [REDACTED]

Thank you for sharing the income information on your recent LIHEAP application. Based on this information, you qualify for enrollment in the UGI Utilities Customer Assistance Program (CAP) for account number [REDACTED].

Enrollment in the CAP Program will assist you in managing your monthly energy bill, is free, and has no impact on your credit score.

Opt In Now

Email us at assistance@ugi.com - please copy the following information in green and quotes to include in the email: "Yes, I want to enroll account number [REDACTED] into the Customer Assistance Program."

Benefits of CAP

- A personalized monthly payment based on income or average bill.
- Past due debt forgiveness with timely and in full monthly payments.
- The potential for additional forgiveness while in the program, including the difference between your CAP payment and the actual usage bill.

If you have recently enrolled in CAP, you can disregard this email.

Thank you,

UGI Utilities

APPENDIX I
CEOP

APPENDIX I

UGI Utilities, Inc. – Gas Division
UGI Utilities, Inc. – Electric Division

Consumer Education and Outreach Plan

Docket Nos. M-20253054362
 M-20253054366

Filing Date: April 1, 2025
Compliance Filing: July 2, 2026

Consumer Education and Outreach Plan

UGI Utilities, Inc.

I. BACKGROUND

On March 31, 2020, amendments to the Pennsylvania Public Utility Commission's ("Commission") Customer Assistance Program ("CAP") Policy Statement (at 52 Pa. Code § 69.261, *et al.*) became effective, including a provision stating that consumer education and outreach plans ("CEOP") should be developed. The CEOP should target low-income customers and be incorporated into a utility's Universal Service and Energy Conservation Plan ("USECP"). 52 Pa. Code § 69.265(8)(i). Additionally, CEOPs should tailor and align educational outreach efforts with the demographics of the utility's service territory. 52 Pa. Code § 69.265(8)(vi)(B). Further, per 52 Pa. Code §§ 69.265(8)(vi)(B)(I-II) and 69.265(8)(vi)(C), CEOPs should include: (1) specific efforts to educate and enroll customers at/below 50% of the Federal Poverty Income Guidelines ("FPIG"); (2) resources, translation services and translated materials for Limited English Proficiency ("LEP") customers; and (3) referrals to other appropriate support services. Accordingly, UGI Utilities, Inc. – Gas Division ("UGI Gas") and UGI Utilities, Inc. – Electric Division ("UGI Electric") hereby provide this CEOP in accordance with the above-described provisions for incorporation into its 2026-2030 USECP.

II. PURPOSE

The CEOP is an evolving process that will be modified and enhanced as needed within the duration of the 2026-2030 USECP. This CEOP is structured to perform the following educational outreach activities in accordance with 52 Pa. Code § 69.265(8):

- A. Educate all customers regarding the benefits and responsibilities of CAP participation.
- B. Educate all customers regarding the importance of energy conservation.
- C. Perform focused CAP education outreach to the demographics comprising UGI's service territory.
- D. Educate and enroll interested and eligible customers in CAP with income levels at or below 50% of the FPIG.
- E. Utilize translated materials and services for LEP customers in UGI's service territory.
- F. Refer low-income customers to appropriate support services.

The above activities are performed in conjunction with Community Based Organizations ("CBOs") that UGI partners with to perform daily operations for UGI's low-income programs.

III. UGI'S CEOP

A. Universal Service CEOP Roles

Members of UGI's Universal Services Program team educate customers about USECP program offerings through various means. These employees include one Manager Universal Service Programs, one LIURP Manager, , one Universal Service Program Administrator, one Senior Customer Outreach Representative, six Customer Outreach Representatives, and two LIHEAP Outreach Representatives.

These employees also are subject matter experts for specific programs including CAP, Operation Share, Low Income Usage Reduction Program ("LIURP"), and Low Income Home Energy Assistance Program ("LIHEAP"). Education for these programs is provided by way of in-person Winter Assistance Relief Mobilization ("WARM") events, direct mail campaigns, responses to email inquiries, phone conversations, social media resources, and UGI's website. In addition, UGI provides educational materials to its CBOs (e.g., Conservation Literature, Universal Service Plan brochures, CAP application packets, etc.) for community distribution.

Moreover, two LIHEAP Outreach Representatives provide support to County Assistance Offices ("CAO"), and provide assistance to customers at WARM events.

B. Education Regarding the Benefits and Responsibilities of Low Income Program Participation

UGI’s customers receive general information regarding the Company’s Universal Services programs: Operation Share, CAP, LIURP,¹ and Customer Assistance Referral Evaluation Services (“CARES”),² as well as other information about ways they can reduce their bills or obtain assistance in paying their bills, as specified in Table 1 below.

TABLE 1

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
Bill Assistance Insert	Energy Efficiency and Conservation (“EE&C”) Programs for Gas & Electric. CAP, LIHEAP, Operation Share, and LIURP household income qualification and program education.	Every other month, beginning Oct. 2023	English, Spanish	Mail	All mail customers	<u>Exhibit 1:</u> Customer Programs Insert
Telephone On-Hold Message	Bill pay help contact information.	Continuous	English, Spanish	Phone calls into UGI Call Center	All customers who call UGI	N/A
UGI Website Assistance Page	Low Income Program and EE&C content.	Continuous	English	Online	All customers who visit UGI.com	<u>Exhibit 2:</u> Links to Assistance Webpages
News Releases	LIHEAP season opening information (e.g., grant period, contact information to apply, poverty level guidelines, etc.)	Released 1 to 4 weeks prior to November 1 each year	English	Mail, email, and websites	All customers	<u>Exhibit 3:</u> LIHEAP News Release
New Customer Guide	Contact information for payment arrangements, Budget Billing, assistance programs, fuel funds, and agency referrals. Includes a brief summary of LIHEAP, CAP, Operation Share and LIURP with contact information.	When new accounts are established.	English	Mail, Email	All new customers	<u>Exhibit 4:</u> Welcome Packet

¹ The LIURP is offered to reduce the energy consumption of low-income customers through the installation of energy conservation measures and energy conservation education. Eligible customers may receive in home or telephonic energy education sessions.

² Each CARES customer may receive an informational mailing. The mailing contains educational material on each of the assistance programs and any other referral information that may be helpful to the customer. Customer Outreach employees maintain contact with CBOs through referrals and educational services.

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
New Income Guidelines	Presents (1) the new annual income guidelines; (2) USECP information; and (3) a link to UGI’s website assistance form.	February/ March	English, with contact information in Spanish	Email	Residential customers who provided email addresses when establishing service or who have an online portal account	<u>Exhibit 5:</u> Income Guidelines Email
Program Awareness	Awareness messaging targeted at customers in situations that could benefit from USECP programs with application information.	Bi-monthly	English	Text	Residential customers who opted in to receive assistance text messages	<u>Exhibit 6:</u> Program Awareness Messaging
Ebill Assistance Links	Bill pay assistance website link.	Continuous	English	Online Ebill Portal	Ebill customers	<u>Exhibit 7:</u> Ebill Assistance Website Link
Social Media Posts	Various benefits messaging prompting customers to contact UGI about USECP enrollment.	Quarterly	English	Facebook	All customers who access UGI on Facebook.	<u>Exhibit 8:</u> 2024 Social Media Posts

The communications included in Table 1 and their attendant exhibits demonstrate that the Company utilizes various forms of marketing channels to promote its USECP programs by outlining the benefits and responsibilities of each program.

1. Targeted Outreach about USECP Programs

UGI also performs more targeted outreach to customers about the Company’s USECP programs as specified in Table 2 below. The direct targeting provides customer-specific information (e.g., CAP monthly payment, CBO or CAO information) to low-income customers. These communications encourage program enrollment to help eligible customers. The Company will include information on CAP enrollment and PPA forgiveness on door hangers, 10-day and soft notices.

TABLE 2

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
USP Brochure	Details of each USECP program’s benefits and eligibility requirements.	Brochures sent upon request to CBOs and various Mayors’ Offices identified in the 2025 Gas BRC Settlement and then distributed as applicable.	English, Spanish	Low-income customers who engage with CBOs, WARM Events, and Mayors’ Offices in Allentown, Bethlehem, Easton, Harrisburg, Hazleton, Lancaster, Lock Haven, Pottsville,	Low-income customers who engage with CBOs	<u>Exhibit 9:</u> USP Brochure

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
				Reading, Scranton, Wilkes Barre and Williamsport.		
Self-Reported Low Income (“SRLI”) Email Journey	Email series to SRLI customers regarding USECP program benefits with a link to begin enrollment process. Each email showcases a different program. The final email provides info about text campaign.	Bi-weekly over the course of 8 weeks	English	Email	SRLI customers who provide email addresses	<u>Exhibit 10:</u> SRLI Emails
LIHEAP Email	LIHEAP explanation, with income guidelines, link to COMPASS website, information on how to apply (including UGI account number). Also provides LIURP benefits and enrollment information, link.	March	English	Email	All residential customers who provided email addresses.	<u>Exhibit 11:</u> LIHEAP Email
Utility File Transfer (UFT) LIHEAP	Targets LIHEAP recipients who received less than the maximum grant amount. Aimed at getting them additional LIHEAP funds. Customer must opt-in to receive.	February through end of LIHEAP season.	English	Mail and Email	LIHEAP recipients who received less than the maximum grant for current program year.	<u>Exhibit 12:</u> UFT Letter & Email
Conservation Packets/Literature	Conservation benefits with a paragraph about available assistance in 10 languages. Contains energy saving tips and information about EE&C Programs.	Materials sent to CBOs upon request.	English (with multi-language sheet enclosed)	Handouts by CBOs and Mail	Low-income customers who engage with CBOs.	<u>Exhibit 13:</u> Conservation Packet Literature

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
Solicitation of (SRLI but no CAP)	Explains CAP benefits and requests that SRLI customers apply for CAP.	Electric – Mailers sent twice a year in spring and fall until auto-enrollment begins in January 2024. Gas – Mail and email sent before fall.	English	Mail and Email	Customers with SRLI indicators who are not enrolled in CAP	<u>Exhibit 14:</u> SRLI No CAP Mail & Email
CAP Recertification	Targeted outreach mailings to CAP customers in a two-step process. For Step 1, a letter is sent 30 days prior to the recertification due date. For Step 2, a letter is sent on the recertification due date.	As needed	English	Mail	CAP customers who need to recertify for program enrollment who did not receive LIHEAP in the current or prior season.	<u>Exhibit 15:</u> CAP Recertification Letters
Video	Overview of CAP and refers customers to LIHEAP and LIURP.	Ongoing since November 2023.	English	UGI.com, YouTube, and Email	Non-CAP SRLI customers at Level 0 or Level 1 and LIHEAP No CAP Eligible customers; general public	<u>Exhibit 16:</u> UGI CAP (English) video link.
Video	Overview of CAP and refers customers to LIHEAP and LIURP (Spanish)	Ongoing. Added to UGI.com (and YouTube) in July 2024.	Spanish	UGI.com	Any visitor to CAP pages of ugi.com	<u>Exhibit 17:</u> El Programa de Asistencia al Cliente (Spanish) video link.
Operation Share Bill Insert	Explains Operation Share program benefits and contains donation form.	December	English, Spanish	Mail	All customers	<u>Exhibit 18:</u> Operation Share Bill Insert
Expositions (“Boots on the Ground”) - USECP	Overview of low-income programs explaining situational assistance, benefits, with income guidelines and contact information.	UGI expos, movie nights and United Way events	English	Handout in giveaway bags	All customer attendees	<u>Exhibit 19:</u> BOTG Handout

Communication	Content	Frequency	Language	Distribution	Recipients	Exhibit
WARM - In-Person Events to Enroll Income-Eligible Customers into Programs	UGI provides USP applications and reviews attendee accounts for applicable programs benefits.	Ongoing since October 2022	English, Spanish	In-person events held at targeted locations within the Company’s service territory as identified in the 2025 Gas BRC settlement.	Low-income customer attendees	<u>Exhibit 20:</u> WARM Marketing
CAP Eligibility Landing Page (Low Income Customer Assessment and Outreach Pilot)	Find out if eligible for CAP by visiting website landing page	Ongoing	English	All assistance program collateral	UGI gas customers	<u>Exhibit 21:</u> CAP Eligibility Screen Capture

C. Educate and Enroll Interested and Eligible Customers within the 0-50% FPIG Range in Low Income Programs

The Company anticipates starting targeted communications to the 0-50% FPL level once the 2026-2030 USECP is approved. These targeted communications are still under development. However, they will provide details about the various low income programs. For example, UGI is preparing a communication explaining that customers who receive SNAP could qualify for utility bill assistance. Additionally, the UGI Outreach team is working closely with the Community Relations team to support various organizations that assist low-income customers (e.g., Power Packs Project, Wildheart Ministries³). Some of these events are focused on the 0%-50% FPL audience. Finally, as stated above, UGI is providing targeted communications to customers that self-report being low income.

D. Low Income Customer Conservation Education

Regarding conservation education for low-income customers, UGI provides Conservation Packets to its CAP and LIURP agencies for distribution. These packets include the following items:

- Adult coloring book (with energy saving tips)
- Child coloring book: “Sparky” the Energy Saving Squirrel
- Magnet with contact information to inquire about low-income and energy-saving programs
- Safety – “Smell Gas” steps
- Energy Saving Tips brochure

Information regarding all energy assistance programs with translated content

E. Low-Income Referrals to Other Support Services

a. External Referrals

UGI refers its low income customers to other organizations that may be able to provide assistance based on the circumstances presented. CAP letters will be modified to include information on programs available through other agencies. For example, UGI has referred customers to local churches and food banks, Office of Aging, PA 211, Service Access & Management, Inc., etc. UGI also plans to engage with predominantly Spanish-speaking cultural

³ Power Packs Project is a non-profit organization that aims to improve the mental and physical health of children by helping their parents provide nutritious meals over weekends when school breakfast and lunch programs are unavailable to them. Outreach representatives attended an event in April 2025 at Wildheart Ministries (<https://www.wildheartministries.net/ministries/love-the-hill>).

organizations, such as the Spanish American Civil Associations (“SACA”) and currently is in discussions with Centro Hispano. In July 2024 we sent safety brochures and assistance brochures to 27 cultural and 35 community-based organizations. In May 2026 we began distributing a handout to food banks that provides information about CAP and directs customers to the CAP eligibility website.

b. Internal USECP Referrals

Customers who express the need for a particular service, e.g., related to a protection from abuse order, are referred to UGI’s CARES program. Customers do not need to be in any FPIG level to participate. If a customer contacts the Call Center, states they are low income and requests specific information about a program, they are referred to UGI’s Outreach team. The Outreach team will evaluate the customer’s account to determine which programs may be beneficial. Next, the Outreach team sends the customer appropriate program information by mail, including applications and program benefit materials. The mailing contains information about which specific CBOs can assist the customer in enrolling in the most beneficial program(s).

UGI also performs Warm Referrals for both Electric and Gas customers, which automatically refers the customer to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). Specifically, the Company proactively determines if these customers qualify for benefits under these other programs and solicits them for participation. The customer does not need to apply for these programs. Benefits to qualifying customers include CAP enrollment, weatherization measures at residences, and/or energy assistance grants for heating bills.

F. Demographics-Focused Low-Income Customer Education

To determine the demographics of the low-income population in its service territory, UGI monitors census data periodically and obtains the languages spoken in the counties comprising its distribution systems. This information guides UGI’s efforts for translating customer communications, as required in 52 Pa. Code § 56.91(b)(17) (relating to termination notice provisions in Spanish and other languages when 5% or more of the residents use those languages). Tables 3 and 4 below provide UGI’s demographic analysis using the 2019-2023 American Community Survey 5-Year Estimates. . The tables provide counts for residential, confirmed low income (“CLI”) and estimated low income (“ELI”) customers by county. It also shows what percentages of the residential customer counts are English speaking, Spanish speaking and Other language speaking. For UGI Gas, on a total residential customer basis, 89.04% of UGI Gas customers are English speaking, 6.70% are Spanish speaking, and 4.27% combined speak All Other languages. For UGI Electric, on a total residential customer basis, 90.14% of UGI Electric customers are English speaking, 7.29% are Spanish speaking, and 2.67% combined speak All Other languages.

G. Utilize Translated Materials and Service for LEP Customers

As Tables 3 and 4 below show, the demographics for UGI’s CLI and ELI populations are mainly English and Spanish. A smaller contingent of these populations (i.e., All Other) speak Ukrainian, Russian, Italian, Hindi, French, German, Arabic, Japanese, and Simplified Chinese (each individually lower than 5%). The Company typically provides USECP program applications and education materials in English. Applications are provided in Spanish upon request. Tables 1 and 2 above show the materials that are provided in Spanish to customers.

The Company is working to create both English and Spanish versions of its low-income program forms and letters. The Spanish-translated versions will be sent to customers upon request initiated through our Customer Contact Center discussions. UGI also provides translation services to its low-income customers during phone inquiries, as needed. Translation services are available to LEP customers when calling UGI’s Customer Contact Center. Upon request, UGI will secure an interpreter to aid customers inquiring about Universal Services. Additionally, UGI added a dedicated queue of Spanish-speaking Customer Service Representatives in 2024.

Additionally, the Company has distributed the following statements in multiple languages to let customers know that a translator can be provided if needed. The statements are as follows:

- Statement 1 (Conservation Packets): UGI is committed to helping customers who make a sincere effort to pay their bills. Our representatives can assist you by providing information on a variety of energy assistance programs, making referrals to local agencies, offering participation in fuel funds or establishing payment arrangements. Language service interpreters are available to help over the phone. Call (800) UGI-WARM or (800) 844-9276 to learn more.
- Statement 2 (CAP Application): If you need assistance paying your UGI bill or want to know more about programs available to help with your utility bill, contact UGI at (800) 276-2722. UGI has interpreters available, free of charge.

The statements appearing in Exhibit 19 have been translated in Spanish, Ukrainian, Russian, Italian, Hindi, French, German, Arabic, Japanese, and Simplified Chinese.

Additionally, the statements have been distributed to UGI's CBOs and CAOs since May 2023. CBOs and CAOs will request additional supplies when needed. The flyers also will be included as an insert with all new applications for low-income programs.

Regarding WARM events, the Outreach team has program literature available in English and Spanish when attending all events. In addition, CBOs have UGI literature, e.g., the UGI Universal Service Program brochure, program applications and program benefit information, in both English and Spanish, and many CBOs offer bilingual services.

In-person WARM events occurred from October 2019 through March 2020. They were paused as a result of COVID-19. They re-started in October 2022. The UGI Outreach team works with local CBOs, local food banks, and other assistance agencies (e.g., senior centers) to advertise its WARM events. Additionally, WARM events are advertised on UGI's website, and through emails to residential customers within specific ZIP codes where the events are taking place. UGI's CBOs support UGI's efforts with these events to provide direct one-on-one support to customers and assist with program enrollment. Typically, UGI has a bilingual Outreach team member at each WARM event to provide assistance to LEP customers. In addition, during these events, Outreach team members utilize translation services provided by a vendor for languages other than English and Spanish, if needed. Also, agencies (e.g., the Public Utility Commission, BeWise, Community Outreach organizations, Senior Support outfits) hosting events regularly have bilingual staff that are utilized for LEP customers.

BeWise is a half day human services conference promoting consumer awareness, utility education, and life management skills. These conferences are attended by agencies, school counselors, and other community workers that learn about the programs to provide education to their clients. UGI continues to work with BeWise, senior centers and other Community Outreach agencies to attend events to provide additional insight to available programs.

Since 2022, UGI has hosted WARM events at requested locations (Bethlehem, Lancaster City, Mount Joy, Manheim, and Mountville). Additionally, the Company (1) provides several local food pantries with Universal Service literature to distribute; (2) sends Universal Service program brochures to County Assistance Offices to distribute; and (3) created a CAP educational video and considers creating potential future videos on a regular basis for other UGI low-income programs.

UGI also provides in-person support at similar events hosted by agencies – e.g., Community Outreach Events, Senior Expos. UGI personnel have attended Community Outreach Events, such as food pantry distributions, Angel Tree sign-ups (Salvation Army), back-to-school backpack distributions and AKA Energy Forums. Senior Expos typically host many vendors that provide information and giveaways for senior citizens. UGI personnel use these events as an opportunity to educate participants on programs that are available to qualified customers.

Table 3 UGI Gas:

Community Served				Language Spoken in Household			
	# Residential Customers	# Estimated Low Income Customers	# Confirmed Low Income Customers	English	Spanish	All Others	Total
Adams	39	7	2	37	1	-	39
Allegheny	-	-	-	-	-	-	-
Armstrong	-	-	-	-	-	-	-
Beaver	-	-	-	-	-	-	-
Bedford	620	177	45	606	4	11	620
Berks	72,361	15,561	7,993	60,566	9,552	2,243	72,361
Blair	516	176	35	504	3	9	516
Bradford	3,742	1,076	397	3,671	37	37	3,742
Bucks	8,066	882	265	7,235	234	597	8,066
Butler	-	-	-	-	-	-	-
Cambria	-	-	-	-	-	-	-
Cameron	-	-	-	-	-	-	-
Carbon	2,874	692	287	2,722	86	66	2,874
Centre	259	93	35	240	5	13	259
Chester	2,955	336	163	2,701	100	154	2,955
Clarion	3,313	1,075	263	3,237	17	56	3,313
Clearfield	2,195	582	232	2,129	26	40	2,195
Clinton	2,398	778	261	2,266	19	113	2,398
Columbia	6,999	2,239	806	6,810	42	147	6,999
Crawford	-	-	-	-	-	-	-
Cumberland	45,902	8,991	2,073	42,643	918	2,341	45,902
Dauphin	50,231	11,601	6,169	45,158	2,361	2,712	50,231
Delaware	-	-	-	-	-	-	-
Elk	-	-	-	-	-	-	-
Erie	-	-	-	-	-	-	-
Fayette	-	-	-	-	-	-	-
Forest	633	202	46	598	20	15	633
Franklin	3,797	735	228	3,603	118	76	3,797
Fulton	3	1	-	3	-	-	3
Greene	-	-	-	-	-	-	-
Huntingdon	1,339	333	133	1,299	20	20	1,339
Indiana	-	-	-	-	-	-	-
Jefferson	-	-	-	-	-	-	-
Juniata	-	-	-	-	-	-	-
Lackawanna	58,138	14,427	7,695	53,894	2,326	1,919	58,138
Lancaster	74,000	12,952	4,776	63,566	4,514	5,920	74,000
Lawrence	-	-	-	-	-	-	-
Lebanon	20,947	4,341	1,687	18,685	1,655	587	20,947
Lehigh	53,091	12,200	6,529	41,889	8,335	2,867	53,091
Luzerne	73,154	23,584	13,069	65,839	5,413	1,975	73,154
Lycoming	18,450	4,921	2,362	17,989	166	314	18,450
McKean	3,708	1,104	446	3,634	33	41	3,708
Mercer	-	-	-	-	-	-	-
Mifflin	2,563	874	232	2,371	21	172	2,563
Monroe	3,638	852	468	3,089	324	226	3,638
Montgomery	3,531	497	68	3,153	95	282	3,531
Montour	2,080	508	119	1,974	29	77	2,080
Northampton	52,934	10,113	4,463	46,264	4,235	2,435	52,934
Northumberland	11,356	3,190	1,591	10,993	182	182	11,356
Perry	-	-	-	-	-	-	-
Philadelphia	-	-	-	-	-	-	-
Pike	1,038	212	46	906	75	56	1,038
Potter	5,848	1,664	645	5,690	23	129	5,848
Schuylkill	3,239	907	441	3,084	94	65	3,239
Snyder	2,033	527	159	1,899	26	108	2,033
Somerset	-	-	-	-	-	-	-
Sullivan	-	-	-	-	-	-	-
Susquehanna	336	86	47	330	3	4	336
Tioga	12,915	3,341	1,317	12,631	103	181	12,915
Union	1,675	368	67	1,543	45	87	1,675
Venango	871	260	54	857	4	10	871
Warren	-	-	-	-	-	-	-
Washington	-	-	-	-	-	-	-
Wayne	2,210	565	249	2,091	57	62	2,210
Westmoreland	-	-	-	-	-	-	-
Wyoming	376	90	25	370	2	4	376
York	1,505	284	60	1,403	69	33	1,505
Total	617,878	143,404	66,048	550,172	41,392	26,386	617,878
				89.04%	6.70%	4.27%	

Table 4 UGI Electric:

				Language Spoken in Household			
Community Served	# Residential Customers	# Estimated Low Income Customers	# Confirmed Low Income Customers	English	Spanish	All Others	Total
Luzerne	54,884	16,274	9,440	49,396	4,061	1,482	54,884
Wyoming	886	195	71	873	4	9	886
Total	55,770	16,469	9,511	50,269	4,065	1,491	55,770
				90.14%	7.29%	2.67%	

Gas and Electric data based on 2019-2023 American Community Survey 5-Year Estimates - United States Census Bureau.