



June 10, 2020

VIA E-FILE

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Re: UGI Utilities, Inc.'s Universal Service and Energy Conservation Plan for January 1, 2020 – December 31, 2025; Docket Nos. M-2019-3014966, P-2020-3019196.

Dear Secretary Chiavetta:

Attached for filing, please find the **Answer of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Petition of UGI Utilities, Inc. – Gas Division and Electric Division to Amend Its Universal Service and Energy Conservation Plan.**

Pursuant to the Commission's Emergency Order issued on March 20, 2020, and as indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully submitted,

A handwritten signature in black ink that reads "John W. Sweet". The signature is written in a cursive style with a horizontal line above the name.

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: Certificate of Service
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Universal Service and Energy Conservation : Docket No. M-2019-3014966
Plan for January 1, 2020 – December 31, 2025 : P-2020-3019196

**ANSWER OF THE COALITION FOR AFFORDABLE UTILITY
SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT

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I. INTRODUCTION AND BACKGROUND

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.61(e), 5.71-.76, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Answer to the Petition of UGI Utilities, Inc., to modify its Universal Service and Energy Conservation Plan (USECP) for January 1, 2020 – December 31, 2015. CAUSE-PA supports UGI’s Petition to modify its USECP consistent with the Commission’s recently amended Customer Assistance Program (CAP) Policy Statement. CAUSE-PA additionally offers recommendations to help clarify inconsistencies in UGI’s proposed amended USECP.

In support thereof, CAUSE-PA states as follows:

1. On September 19, 2019, the Commission adopted a Final Policy Statement and Order, which was entered November 5, 2019 at Docket No. M-2019-3012599. (November 5 Order). The November 5 Order made a number of critical reforms to the Commission’s Customer Assistance Program (CAP) Policy Statement at 52 Pa. Code §§ 69.261-.267.¹ Based on nearly three years of investigatory review of extensive data and analysis in two separate statewide proceedings,² the Commission concluded that the then-applicable CAP energy burden standards were excessive and did not fulfill the Commission’s statutory obligation to ensure that universal service programming is appropriately funded and accessible to low income customers. (See November 5 Order at 27).

¹ 2019 Amendments to CAP Policy Statement, Final Policy Statement and Order, Docket No. M-2019-3012599, at 27 (order entered Nov. 5, 2019) (hereinafter November 5 Order).

² Energy Affordability for Low-Income Customers, Docket No. M-2017-2587711, and Review of Universal Service and Energy Conservation Programs, Docket No. M-2017-2596907.

2. Accordingly, the Commission amended its CAP Policy Statement to reduce the maximum energy burden standards for customers enrolled in a utility-run CAP, setting a maximum *combined* energy burden of 10% for households with income between 51-150% of the Federal Poverty Level (FPL) and 6% for households with income between 0-50% FPL. (Id. at 32-33). For electric baseload (non-heating) customers, the maximum energy burden was set at 4% for customers with income between 51-150% FPL and 2% for customers with income between 0-50% FPL. (Id.) In reducing the maximum energy burden standards, the Commission found that the existing maximum energy burden standards, originally established in 1992, “do not reflect reasonable or affordable payments for many low-income customers” - especially for those with income at or below 50% FPL. (Id. at 27, 29-30).
3. In addition to adjusting the maximum energy burden standards, the Commission made a number of other critical reforms to its CAP Policy Statement to improve the accessibility and affordability of the program. (See id. at 101-104).
4. To effectuate implementation of the Commission’s revised CAP Policy Statement, the Commission directed each utility to file and serve an addendum to their existing or proposed Universal Service and Energy Conservation Plan (USECP) within 60 days of entry date of the November 5 Order to indicate whether the utility’s existing or pending USECP was consistent with the amended CAP Policy Statement and, if not, how the utility intended to implement the policy changes specified in the amended CAP Policy Statement. (Id. at 106).
5. On October 3, 2019 the Commission entered an Order at Docket No. M-2019-3012601 (October 3 Order) which granted temporary partial limited waivers of 52 Pa. Code § § 54.74, 54.76 (a-b), 62.4, and 62.6 (a-b) for the purpose of adhering to a new USECP and universal services impact evaluation filing schedule. (October 3 Order at 16). The October 3 Order stated

that each utility was to provide enrollment and budgetary projections for any additional USECP years as part of the CAP Policy Statement Order January 6 addendums. (Id. at 15-16).

6. On October 14, 2019, UGI filed an update to its USECP at Docket No. M-2017-2598190, which contained enrollment and budget projections for the additional USECP years created by the October 3 Order.
7. On November 20, 2019, the Energy Association of Pennsylvania (EAP) and the Office of Consumer Advocate (OCA) filed Petitions for Reconsideration and/or Clarification of the Commission's November 5 Order. EAP also filed a Petition to Stay the Commission's November 5 Order until resolution of its Petition for Reconsideration. This Petition for Stay was granted on November 25, 2019.³
8. On December 6, 2019, UGI filed a letter notifying the Commission that it has met the requirements of the October 3 Order and the non-stayed provisions of the CAP Policy Statement Order as, on October 14, 2019, it filed an update to its USECP at Docket No. M-2017-2598190 which contained enrollment and budget projections for the additional USECP years created by the October 3 Order.
9. On January 16, 2020, the Commission approved UGI's USECP for 2020-2025.
10. On February 5, 2020, UGI filed a voluntary addendum (February 5 Addendum) at Docket No. M-2017-2598190, indicating that its 2020-2025 USECP, as approved by the Commission on January 16, 2020, already included fourteen of the seventeen items addressed in the Commission's November 5 Order. UGI's February 5 Addendum also proposed to reduce its CAP percentage of income payments (PIP) to comply with the Commission's November 5

³ 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-267, Docket No. M-2019-3012599 (order entered November 25, 2019).

order and to revise the language in its USECP to indicate that customers are not required to direct LIHEAP grants to UGI as a requirement for enrollment in CAP.

11. On February 6, 2020, the Commission issued an Order (February 6 Order) addressing EAP's Petition for Reconsideration and/or Clarification, which further clarified that full compliance with the Commission's amended CAP Policy Statement is voluntary at this time, and directed each utility to file and serve a cover letter and addendum to their current Plan, consistent with the Commission's November 5 and February 6 Orders within 15 days. (February 6 Order at 14, para. 3). The Commission emphasized in its Order that "[i]mplementation of the amendments to the Customer Assistance Program Policy Statement is strongly encouraged on or before January 1, 2021." (Id.)
12. On May 21, 2020, consistent with the Commission's February 6 Order, UGI filed the instant Petition, seeking approval to implement a number of proposed amendments to its current USECP. CAUSE-PA files this Answer in response thereto and in support thereof.

II. STANDING

13. Pursuant to the requirements contained in 52 Pa. Code § 5.61(e), CAUSE-PA asserts that it has standing to intervene and file an Answer in this proceeding.
14. Eligibility to intervene in Commission proceedings is governed by Section 5.72, which provides that "[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code. § 5.72(a).
15. Section 5.72 further provides that the right or interest may be one "which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." (Id. at (a)(2)).

16. While Section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “an association may have standing as a representative of its members... as long as the organization has at least one member who has or will suffer a direct, immediate, and substantial injury to interest as a result of the challenged action, [the organization] has standing.”⁴
17. CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services.
18. CAUSE-PA membership is open to individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income Pennsylvanians to connect and maintain affordable utility services.
19. CAUSE-PA is located, c/o Pennsylvania Legal Aid Network, 118 Locust Street, Harrisburg, PA 17101.
20. As an association of low-income individuals, CAUSE-PA has a direct interest in the prompt and efficient implementation of the Commission’s CAP Policy Statement reforms both in UGI’s service territory and across the state. These reforms are designed to address deep and persistent levels of unaffordability within CAP. If allowed to persist without mitigation through the adoption of the Commission’s CAP Policy Statement reforms, economically vulnerable households will continue to be at risk of both physical and financial harm.⁵

⁴ Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. Ct. 2010) (alteration in original) (citing Tripps Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. Ct. 1980); Parents United for Better Schools v. School District of Phila., 646 A.2d 689 (Pa. Commw. Ct. 1994).

⁵ See Diana Hernandez, Understanding “Energy Insecurity” and Why It Matter to Health, J. Social Science & Medicine 167, at 1-10 (2016).

21. CAUSE-PA has standing to intervene because at least one member of CAUSE-PA may suffer a direct, immediate, and substantial injury to their interests as a result of this proceeding.⁶

22. CAUSE-PA is represented in this proceeding by:

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23. Counsel for CAUSE-PA consents to the service of documents by electronic mail to pulp@palegalaid.net, as provided in 52 Pa. Code § 1.54(b)(3).

III. ANSWER

a. CAUSE-PA supports UGI's proposals to implement changes to its USECP that will improve both the affordability and accessibility of its CAP.

24. CAUSE-PA strongly supports UGI's proposal to implement a number of immediate changes to its USECP consistent with the Commission's recently amended CAP Policy Statement.

Specifically, CAUSE-PA is supportive of UGI's proposals to:

- a. Modify the CAP maximum energy burdens in its USECP to reduce its applicable energy burden for electric and natural gas heating and non-heating CAP customers (Pet. at ¶ 23-26);
- b. Retain its current percentage of income payment requirements for electric heating customers at 51-150% FPL (Pet. at ¶ 24-25);
- c. Revise language in its USECP to reflect that payment troubled status is not an eligibility requirement for CAP (Pet. at ¶ 31); and

⁶ See Energy Cons. Council of Pa., 995 A.2d at 476.

- d. Revise language in its USECP to reflect that UGI will not require a customer to designate a LIHEAP grant to UGI as an eligibility requirement for CAP (Pet. at ¶ 32).

25. CAUSE-PA also supports UGI's proposal to promptly implement the proposed changes to its USECP within 30 days following Commission approval for new CAP customers and as part of the next quarterly certification for existing CAP customers. (Pet. at ¶ 34).

26. Low income households are often forced to make dangerous decisions between utility services and critical medical care, food, clothing, and other basic necessities.⁷ The proposals listed above will help to immediately address chronic unaffordability amongst consumers with the greatest need, and will likewise remove common barriers to program accessibility, enrollment, and recertification. We urge the Commission to approve the above-listed aspects of UGI's proposed amended USECP without delay to better ensure consumers of limited economic means can access and maintain affordable utility service, consistent with the Commission's amended CAP Policy Statement.

27. The proposed amendments listed above are consistent with and in furtherance of the Commission's thoroughly vetted and approved CAP Policy Statement, and CAUSE-PA urges the Commission to approve these aspects of UGI's proposed amended USECP without delay. As the Commission itself emphasized, "[i]mplementation of the amendments to the Customer Assistance Program Policy Statement is strongly encouraged on or before January 1, 2021." (February 6 Order at 14, para. 3). Swift review and approval of these proposed amendments will ensure that UGI can implement critical and necessary changes to its CAP in a timely

⁷ See Review of Universal Service and Energy Conservation Programs, Joint Comments of CAUSE-PA & TURN et al., at 11-12, Docket No. M-2017-2596907 (Joint Comments filed August 8, 2017); see also Energy Affordability for Low-Income Customers in Pennsylvania, Joint Comments of TURN et al. & CAUSE-PA, at 12, Docket No. M-2017-258-7711 (comments filed May 8, 2019).

manner and within the targeted January 1, 2021 deadline set forth by the Commission in its February 6 Order.

28. In addition to being consistent with the Commission’s amended CAP Policy Statement, CAUSE-PA asserts that implementation of the above listed changes will also, as the Commission explicitly intended, provide critical data and information that will better inform the upcoming CAP rulemaking. (See EAP Order on Reconsideration at 5 (“The information obtained from utility and other stakeholder experiences relative to the CAP Policy Statement, especially as amended, will be informative in determining CAP provisions to be promulgated as regulations.”)). Delay in implementation of these proposed amendments will not provide an adequate time to help inform the regulations.

29. CAUSE-PA asserts that, in approving the above listed aspects of UGI’s proposed amended USECP, the Commission should require UGI to work collaboratively with its Universal Service Advisory Committee (USAC) to monitor implementation of and the costs associated with UGI’s CAP reforms. Specifically, CAUSE-PA asserts that UGI should work with its USAC to further refine its Consumer Education and Outreach Plan. Additionally, UGI should work with its USAC to identify appropriate metrics for measuring the success of its amended programs and to review data and information associated with the reduced energy burden and improved affordability.

b. CAUSE-PA recommends that UGI revise its proposed amended USECP to clarify conflicting language in its USECP and addendum.

30. While CAUSE-PA strongly supports UGI’s proposed USECP amendments, described above, CAUSE-PA recommends that UGI make minor revisions to its USECP to resolve conflicting terms between UGI’s Petition, its USECP, and its February 5 Addendum. Clarification of these

terms is necessary to ensure that the USECP complies with the Commission's CAP Policy Statement, to avoid confusion, and ensure that the USECP is implemented consistently.

31. In its February 5 Addendum, in its Paragraph 3 Response, UGI responds to the CAP Policy Statement's recommendation that utilities accept income documentation of "30 days or 12 months, whichever is more beneficial to the household." UGI responds by indicating that its "CAP income documentation procedures are in accordance with this provision as shown on page 18 of the Company's recently-approved USECP." (February 5 Addendum at 3). However, upon review of UGI's proposed amended USECP, there is no language describing this income documentation timeframe calculation. While, it may be UGI's unwritten policy to calculate based on a 30 day or 12 month timeframe, UGI should explicitly state these terms in its USECP to avoid confusion among its CAP administrators.

32. Regarding recertification timeframes, UGI indicates in its February 5 Addendum, Paragraph 12 response that its recertification timeframes are "in accordance with the CAP Policy Statement Order as indicated on pages 20-21 of the currently approved USECP." (February 5 Addendum at 5). The CAP Policy Statement indicates that "CAP households whose primary source of income is Social Security, Supplemental Security Income (SSI), or pensions should be required to recertify at least once every three (3) years." (November 5 Order at 69-70). However, UGI's USECP does not mention special recertification timeframes for this group of customers. (UGI 2020-2025 USECP at 20-21) CAUSE-PA recommends that UGI amend its proposed amended USECP to provide three-year recertification timeframes for these households. As the Commission recognized in its November 5 Order, "Elderly residents and people with disabilities often rely on income sources which do not increase much from year-to-year, if at all. Annual changes to these income amounts typically have minimal impact on

CAP benefit calculations.” (November 5 Order at 69). In addition, CAUSE-PA notes that recertification is particularly difficult for Seniors and individuals with a disability, as these households more often lack accessible transportation options and technology necessary to gather and submit income documentation, further supporting the need for extended recertification windows. We therefore urge adoption of this important CAP Policy revision.

c. CAUSE-PA asserts that the projected cost impact of UGI’s proposed CAP reforms is just and reasonable, and should be approved.

33. UGI projects that implementation of its proposed USECP amendments will increase the cost of its CAP by approximately \$3.2 million in 2020, rising to approximately \$3.7 million in 2025. The following table shows UGI’s total projected annual budget increase attributable to its revised PIP from 2020-2025. (Pet. at Tables 3-A and 3-B).

TABLE 1 - Annual Increase Attributable to Revised PIP

	Projected Budget as of May 11, 2020 (Current Approved USECP)	Projected Budget with Revised PIP	Total Projected Annual Increase Attributable to Revised PIP
UGI Gas Division			
2020	\$10,573,200	\$13,781,826	\$3,208,626
2021	\$10,890,396	\$14,195,281	\$3,304,885
2022	\$11,217,108	\$14,621,139	\$3,404,031
2023	\$11,553,621	\$15,059,773	\$3,506,152
2024	\$11,900,230	\$15,511,567	\$3,611,337
2025	\$12,257,237	\$15,976,914	\$3,719,677
UGI Electric Division			
2020	\$3,002,265	\$3,565,732	\$563,467
2021	\$3,091,155	\$3,672,704	\$581,549
2022	\$3,183,890	\$3,782,885	\$598,995
2023	\$3,279,406	\$3,896,371	\$616,965
2024	\$3,377,788	\$4,013,262	\$635,474
2025	\$3,479,122	\$4,133,660	\$654,538

34. UGI currently recovers CAP costs exclusively from non-CAP residential customers.⁸ In its most recent base rate filing, UGI projected that residential customer counts for its Gas division for September 2020 and September 2021 would be 510,663 and 518,941, respectively.⁹ The following table shows the annual and monthly bill impacts for UGI’s non-CAP residential gas customers attributable to UGI’s proposed revised PIP calculation.

TABLE 2 – Revised PIP Projected Cost Per Customer, UGI Gas Division¹⁰

	Total Projected Annual Increase Attributable to Revised PIP	Projected Residential Customer Count	Projected CAP Enrollment with Revised PIP	Total Projected Non-CAP Residential Customers	Projected Annual Cost Per Customer	Projected Monthly Cost Per Customer
2020	\$3,208,626	510,663	25,522	485,141	\$6.61	\$0.55
2021	\$3,304,885	518,941	26,288	492,653	\$6.71	\$0.56

35. By 2025, the total projected budget increase attributable to the revised PIP for UGI’s Gas division would be approximately \$3,719,677 and its projected CAP enrollment would be 29,587. Even if UGI’s residential customer count does not increase after 2021, which is unlikely given the continued expansion of natural gas across the state, the CAP cost would be spread across at least 489,354 non-CAP residential gas customers – resulting in a maximum increased cost to non-CAP residential ratepayers of approximately \$7.60 per year or \$0.63 per month. CAUSE-PA asserts that this is a small price to pay in return for the host of far-ranging individual and societal benefits associated with improved energy affordability.

⁸ Pa. PUC, BCS, 2018 Report on Universal Service Programs and Collections Performance, at Appx. 6 (Dec. 2019) (Noting that the Company recovers CAP only recovers CAP costs from non-CAP residential ratepayers).

⁹ See UGI Gas 2020 Base Rate Case, Docket No. R-2019-3015162, Response to Section 53.53, III-E-19 (Filing Book I, PDF p. 252 of 326).

¹⁰ Unfortunately, there is not adequate publicly available data for UGI’s Electric Division to perform a similar analysis at this time.

36. It is important to keep in mind that UGI's projections do not include the cost savings that are likely to follow as a result of the dramatic improvements to CAP affordability, CAP retention, and CAP collections policies. As the Commission explored throughout the underlying Universal Service and Energy Burden investigations, it is well documented that targeting a truly affordable bill improves payment frequency and bill coverage rates. Once implemented, UGI's proposed program changes have the potential to dramatically improve payment coverage and frequency rates, thereby decreasing uncollectible and collections-related expenses.
37. Any increase in rates must always be carefully considered, and the relative costs and benefits carefully weighed. However, CAUSE-PA asserts that – in balance – the increase in the cost of CAP as a result of UGI's proposed USECP amendments is well worth the benefit of making significant improvements to affordability for customers facing extreme levels of economic hardship and disproportionately high energy costs.
38. CAUSE-PA notes that, while not directly relevant to the calculation of the cost of implementing the revised PIP, the ongoing COVID-19 crisis is likely to have a significant *independent* impact on CAP enrollment and cost. But this is no reason to delay implementation of the Commission's revised energy burden standards, and in fact further bolsters the need for such actions to ensure that households who are profoundly struggling to access and afford energy services as a result of the pandemic are provided timely and critical relief.
39. According to UGI's projections, CAP costs for UGI's Gas and Electric divisions will increase due to the COVID-19 crisis. The following table shows the projected budget impact attributable to COVID-19 crisis. (Pet. at Tables 3-A and 3-B).

Table 3 – Increased Cost Attributable to COVID-19 Impact

	Projected Budget with Revised PIP	Projected Budget with Revised PIP and COVID-19 Impact	Total Projected Annual Increase Attributable to COVID-19 Impact
UGI Gas Division			
2020	\$13,781,826	\$15,019,020	\$1,237,194
2021	\$14,195,281	\$15,469,591	\$1,274,310
2022	\$14,621,139	\$15,933,678	\$1,312,539
2023	\$15,059,773	\$16,411,689	\$1,351,916
2024	\$15,511,567	\$16,904,039	\$1,392,472
2025	\$15,976,914	\$17,411,161	\$1,434,247
UGI Electric Division			
2020	\$3,565,732	\$3,982,892	\$417,160
2021	\$3,672,704	\$4,102,379	\$429,675
2022	\$3,782,885	\$4,225,451	\$442,566
2023	\$3,896,371	\$4,352,214	\$455,843
2024	\$4,013,262	\$4,482,780	\$469,518
2025	\$4,133,660	\$4,617,264	\$483,604

40. Applying the projected residential customer counts for UGI Gas division, extrapolated above in paragraph 34, we can see that the projected increase in cost associated with COVID-19 are minimal and, in balance, justified to address widespread unaffordability and acute economic strain on low income households created by the pandemic in recent months.

TABLE 4 –COVID-19 Projected Cost Per Customer, UGI Gas Division¹¹

	Total Projected Annual Increase Attributable to COVID-19	Projected Residential Customer Count	Projected CAP Enrollment with Revised PIP	Total Projected Non-CAP Residential Customers	Projected Annual Cost Per Customer	Projected Monthly Cost Per Customer
2020	\$1,237,194	510,663	25,522	485,141	\$2.55	\$0.21
2021	\$1,274,310	518,941	26,288	492,653	\$2.58	\$0.22

¹¹ Again, there is not adequate publicly available data for UGI’s Electric Division to perform a similar analysis at this time.

41. Spread across the conservative projection of 489,354 non-CAP residential customers in UGI Gas division by 2025, referenced above (see paragraph 35), the additional increased cost of CAP associated with COVID-19 could reach a maximum annual cost of \$2.93 per customer – or \$0.24 per month. Together with the projected increase associated with the reduction in energy burden (\$0.63 per month in 2025) – **the total increased cost on non-CAP residential customers associated with both the energy burden reduction and the increased need associated with COVID-19 would amount to a maximum of approximately \$0.87 per month in 2025.** Again, CAUSE-PA asserts that this is a small price to pay to both dramatically improve affordability and address the increased need for CAP associated with COVID-19.
42. Spreading the costs of CAP to all ratepayers would, of course, alleviate this additional cost to residential ratepayers and would help to ensure that residential consumers do not continue to bear the full costs of this public purpose program. Consistent with the Commission’s November 5 Order and the cost recovery practices of comparable utilities across the nation, CAUSE-PA urges the Commission to again encourage UGI to agree in its current base rate proceeding to spread the cost of CAP and other universal service programs across all rate classes. (See November 5 Order at 80-97). As the Commission concluded in its November 5 Order, “the Commission finds it appropriate to consider recovery of the costs of CAP costs from all ratepayer classes... [and] will no longer routinely exempt non-residential classes from universal service obligations.” (Id.) The impact of CAP costs on non-CAP residential ratepayers associated with the reduced energy burdens can and should be mitigated by permitting these costs to be appropriately and equitably recovered from every customer class – rather than requiring the residential class to bear the entire burden of addressing energy

poverty in our state. Appropriate cost-sharing for these critical public purpose programs would help alleviate the financial impact on residential customers while providing more affordable service to CAP customers and more fairly allocate the costs of these critical programs between all of the entities who enjoy the benefits of UGI's service.

IV. CONCLUSION

For the forgoing reasons, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) strongly supports UGI's Joint Petition. We urge the Commission to approve UGI's proposed revisions without delay, consistent with the rationale discussed above, and to direct UGI to clarify certain aspects of its proposed amended USECP consistent with this Answer.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Dated: June 10, 2020

Verification

I, **John W. Sweet, Esq.**, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



John W. Sweet, Esq.

On behalf of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania (CAUSE-PA)

June 10, 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Universal Service and Energy Conservation : Docket Nos. M-2019-3014966
Plan for January 1, 2020 – December 31, : P-2020-3019196
2025 :

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Answer of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania to the Petition of UGI Utilities, Inc. – Gas Division and Electric Division to Amend Its Universal Service and Energy Conservation Plan** in the above captioned matters upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL ONLY

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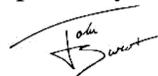
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Dated: June 10, 2020