

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

 @pa\_oca

 /pennoca

FAX (717) 783-7152  
consumer@paoca.org

June 10, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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 electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceedings.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Enclosures:

cc: Office of Administrative Law Judge (**email only**)  
Certificate of Service

\*289965

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 10<sup>th</sup> day of June 2020.

**SERVICE BY E-MAIL ONLY**

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

John R. Evans, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Danielle Jouenne, Esquire  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704

Elizabeth R. Marx, Esquire  
Ria Pereira, Esquire  
John Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: June 10, 2020  
\*289968

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

---

NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

---

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Phillip D. Demanchick  
Assistant Consumer Advocate  
Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152

Respectfully submitted,

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

DATED: June 10, 2020  
\*289957

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention and Answer and to participate in proceedings before the Commission regarding UGI Utilities, Inc. – Gas Division and Electric Division’s (UGI or Company) Petition to Amend Its Universal Serve and Energy Conservation Plan for January 1, 2020 – December 31, 2025 (Petition) filed on May 21, 2020, at Docket Nos. M-2019-3014966 and P-2020-3019196

On May 21, 2020, UGI voluntarily filed its Petition to modify its Universal Service and Energy Conservation Plan (USECP or Plan) consistent with the Commission’s Order dated November 5, 2019 at Docket No. M-2019-3012599, as amended by the Commission’s Order on Reconsideration and Clarification dated February 6, 2020. The Company is seeking to amend its current maximum-tiered energy burdens for its Percentage of Income Payment (PIP) program. The following is UGI’s proposed energy burdens:

**Electric and Natural Gas Non-Heating Customers**

<b><u>Household Income as Percent of FPIG</u></b>	<b><u>Monthly CAP Payment</u></b>
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**

<b><u>Household Income as Percent of FPIG</u></b>	<b><u>Monthly CAP Payment</u></b>
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**

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

Petition, Exh. A at 17-18. UGI is also proposing to remove the term 'payment-troubled' from the definition of eligible customers, which they consider a non-substantive change as the Company has not required this for some time. Petition, Exh. A at 2, 7, 11. Lastly, UGI is seeking to amend language in the USECP clarifying that a customer is not required to designate a LIHEAP grant to UGI in order to be eligible for its universal service program. Petition, Exh. A at 19. UGI's proposed modifications will increase costs to operate its universal service programs for both its gas and electric divisions by approximately \$7.2 million on average for the next five years (including costs associated with the novel coronavirus pandemic).

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of UGI consumers. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission's regulations, statutes and applicable case law and result in rates that are just and reasonable.