

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
HARRISBURG, PENNSYLVANIA 17120**

**UGI Utilities Inc - Gas Division and  
UGI Utilities Inc – Electric Division**

**Public Meeting March 25, 2021  
3023839-LAW  
Docket No. P-2021-3023839  
P-2021-3023992  
M-2019-3014966**

**JOINT STATEMENT OF CHAIRMAN GLADYS BROWN DUTRIEUILLE  
AND VICE CHAIRMAN DAVID W. SWEET**

Before the Commission for consideration and disposition are the Petitions filed by UGI Utilities on behalf of its Gas and Electric divisions requesting approval to establish a second phase of the Emergency Relief Program (ERP) previously implemented for UGI’s Gas division in the Settlement of UGI Gas’ rate case approved by the Commission on October 8, 2020.

Phase 1 of the ERP, among other things, provided arrearage forgiveness to gas customers that accumulated overdue balances between the March and December 2020 billing cycles as a result of the COVID-19 Pandemic. The arrearage credit was limited to 25% of arrearages accumulated during the aforementioned period, up to a maximum of \$400. Customers could also enter into an extended payment arrangement for the remaining arrearage. The Settlement permitted the Company to track and record, as a regulatory asset, inter alia, bill credits provided under the ERP. The Settlement provided that the ERP costs would be eligible for recovery in the Company’s next rate case. The parties to the rate case Settlement reserved their rights to challenge the prudence and reasonableness of those claimed costs in the next filed rate proceeding. Phase 1 of the ERP closed on December 31, 2020.

The instant Petitions for UGI’s COVID-19 ERP Phase II would include, among other things, the following benefits for both gas and electric customers at or below 300% of the FPIG, that enroll in the ERP through April 30, 2021:

- Expanding eligibility for hardship funds (Operation Share) up to 250% of the FPIG through December 31, 2021, to the extent funds are available.
- Increasing the maximum hardship fund grant amount from \$400 to \$600 through December 31, 2021, to the extent funds are available.
- Accepting self-verification of income for customer assistance program (CAP) eligibility and CAP payment determinations.
- Suspending CAP recertification requirements through April 30, 2021.
- Adjusting its low-income usage reduction program (LIURP) thresholds and job cost limitations to cover personal protective equipment (PPE) costs for the duration of the program year.

- Suspension of collection efforts for any amounts due for service beginning with the March 2020 billing cycle and continuing through April 30, 2021;
- Eligible customers that have accumulated arrears during the applicable period will be given a one-time bill credit of up to \$400.
- Eligible customers that have not accumulated any arrears during the applicable period will be given a one-time bill credit of up to \$200;
  - The total direct bill credits provided as part of COVID-19 ERP Phase II for customers without arrears shall be capped at \$1 million for UGI Gas and \$100,000 for UGI Electric and be provided on a first come, first served basis.

The Bureau of Investigation and Enforcement (BIE) is supportive of Phase 2 of the ERP but objects to extending the bill credit to customers without accumulated arrears. UGI stated that throughout Phase I of the COVID-19 ERP, the Company found that many customers impacted by the COVID-19 Pandemic, nonetheless prioritize and continue to pay their utility bills despite experiencing general financial payment difficulties. Although these customers would otherwise qualify for the relief and benefits set forth in the COVID-19 ERP, as they were not in arrears, they were not eligible to participate in the Phase I COVID-19 ERP. To provide these customers with some measure of relief, UGI removed the arrearage requirement for the new phase of the program.

We are persuaded by UGI's statement that there are customers who have managed to pay their bills who, nonetheless, are struggling. We also note that UGI has capped the amount of funds that are available to this subset of customers to \$100,000 for the electric company and \$1,000,000 for the much larger gas company. Furthermore, we agree with both the Office of Consumer Advocate and BIE's positions, similar to Phase 1, that ERP bill credits must be tracked and recorded as a regulatory asset and can be challenged for prudence and reasonableness in the Companies' next rate filings.

We note that in the moratorium docket, utilities urged the Commission to lift the moratorium arguing that the utilities knew their customers and could craft relief programs best suited to assist the prevailing conditions of their respective service territories.<sup>1</sup> UGI, in making the instant request, appears to have done just that. We previously commended UGI for working to ensure reasonable access to service to protect public health during these extraordinary times. We once again extend that commendation.




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**Gladys Brown Dutrieuille**  
Chairman




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**David W. Sweet**  
Vice Chairman

**March 25, 2021**  
**DATE**

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<sup>1</sup> Comments of the Energy Association of Pennsylvania at 9, Docket No. M-2020-3019244, February 16, 2021.