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August 20, 2021

**VIA E-File**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc – Electric Division Universal Service and Energy Conservation Plan for 2020-2025, Docket No. M-2019-3014966

UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc – Electric Division Petition to Amend Universal Service and Energy Conservation Plan for 2020-2025, Docket No. P-2020-3019196

***Joint Request for Extension of Filing Deadlines***

Dear Secretary Chiavetta,

UGI Utilities, Inc. (UGI), together with the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Office of Consumer Advocate (OCA), jointly request an extension of the filing deadlines in the above captioned proceedings at docket numbers M-2019-3014966 and P-2020-3019196. In support thereof, the parties note as follows:

On February 5, 2020, UGI filed an Addendum with the Commission seeking to revise its 2020 Universal Service and Energy Conservation Plan. Thereafter, on May 21, 2020, UGI filed a Petition proposing further amendments to its 2020 USECP. On June 10, 2020, OCA and CAUSE-PA each filed Answers in response to UGI's Addendum and Petition.

On August 5, 2021, the Commission issued an Order Directing Supplemental Information and Establishing Comment Period (Order) in this proceeding. This Order directed UGI to file supplemental information within 20 days, or August 25, 2021. The Order also set a comment and reply comment period for this proceeding, allowing interested parties to submit initial comments within 20 days of the date for filing Supplemental Information (September 14, 2021) and reply comments within 15 days thereafter (September 29, 2021).

UGI, CAUSE-PA, and OCA jointly request the following:

- (1) A 20-day extension of the time for UGI to file Supplemental Information, extending the deadline from August 25, 2021 to September 14, 2021;
- (2) A 35-day initial comment period following UGI's revised deadline to file Supplemental Information, with a new deadline of October 19, 2021; and
- (3) A 20-day reply comment period following the filing of initial comment, with a new deadline of November 8, 2021.

In support of these requests, the parties submit the following:

First, with regard to the request for an additional 20 days to file Supplemental Information, the parties state the following.

The new information requested in the Commission's Order is not readily available to UGI. The CAP costs and energy burden projections in UGI's 2019 USECP filing (i.e., at the percent of income levels established in the CAP Policy Statement) were based on historical data back to 2016 (due to the Company's transition to a new Customer Information system in September 2017).

UGI is in the process of pulling more recent CAP information out of its current IT systems to respond to the data requests in the Order. However, the data requested is not currently tracked by FPL or by heating and non-heating designations. To adequately answer the data requests, the Company must manually scrub and classify the available data into the requested formats (i.e., by FPL and heating and non-heating designations). UGI also has limited resources to dedicate to these requests.

Because the Company is responding to these requests anew and in a firsthand manner, it requires more time than is permitted under the original 20-day deadline established in the Order. As such, the Company, along with CAUSE-PA and OCA respectfully request a 20-day extension period to respond (i.e., by September 14, 2021). This will provide the time needed for UGI to develop and provide the data in the requested format designations.

Second, with regard to the requests for an additional 15 days and 5 days for parties to file comments and reply comments, respectively, the parties state the following.

To provide adequate time to fully assess the new data and information, and in light of other competing deadlines, the parties are requesting additional time to file Comments and Reply Comments.

CAUSE-PA and OCA are active parties in multiple rate proceedings, including the PECO Electric, Pittsburgh Water and Sewer Authority (PWSA), Duquesne Light Company, and Columbia Gas of Pennsylvania rate proceedings. Main Briefs and Reply Briefs in these proceedings are all due the first and second week of September, overlapping substantially with the current timeframe for initial comments in this proceeding. Unlike this proceeding, rate proceedings are all on a statutory deadline, so we are unable to obtain leniency in the timeframe for these other major filing deadlines.

In addition to conflicts with major filing deadlines in multiple rate proceedings, initial comments are currently due in the NFG Universal Service and Energy Conservation Plan (USECP) proceeding on September 14 – the current deadline for initial comments in this proceeding. Reply comments in the NFG proceeding are likewise currently due on September 29, 2021 – the current deadline for reply comments in this proceeding.

If the deadline for Supplemental Information is extended in this proceeding without also enlarging the time to file Initial and Reply Comments, the new deadline for initial and reply comments in this proceeding (October 4, 2021 and October 19, 2021) would conflict with the deadline for initial and reply comments in the FirstEnergy Universal Service and Energy Conservation Plan (USECP) proceeding – which are also currently October 4, 2021 and October 19, 2021.

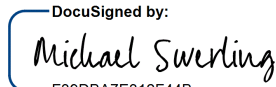
CAUSE-PA and OCA are active parties in the NFG and FirstEnergy USECP proceedings, and assert that this convergence of deadlines in multiple USECP proceedings – given the volume of data to be reviewed and analyzed – creates an unreasonable strain on staff and resources.

UGI, CAUSE-PA, and OCA have worked together to develop a reasonable joint request to extend the timeframe for filing in this proceeding to ensure that each of our respective timing concerns are reasonably addressed. We note that care has been taken to minimize our requests for extension to only that which we believe to be necessary to ensure the parties are able to meaningfully participate in the proceeding and fully respond to the Commission's requests for additional information and analysis to inform its decision in this case.

We are grateful to the Commission for its consideration of this request.

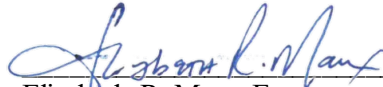
Respectfully Submitted,

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*/s/ Christy Appleby*

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**UGI UTILITIES, INC. – GAS :  
DIVISION AND UGI UTILITIES, :  
INC. – ELECTRIC DIVISION : DOCKET NO. M-2019-3014966  
UNIVERSAL SERVICE AND ENERGY :  
CONSERVATION PLAN FOR 2020- :  
2025 :**

**UGI UTILITIES, INC. – GAS :  
DIVISION AND UGI UTILITIES, :  
INC. – ELECTRIC DIVISION :  
PETITION TO AMEND UNIVERSAL : DOCKET NO. P-2020-3019196  
SERVICE AND ENERGY :  
CONSERVATION PLAN FOR 2020- :  
2025 :**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

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