

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 4, 2022

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

Dear Secretary Chiavetta:

On February 11, 2022, the Commission issued a Secretarial Letter in the above-referenced dockets requesting additional information regarding the Company's proposal to change its energy burdens. The Company filed its Data Responses of UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc. – Electric Division (collectively UGI) on February 22, 2022. The Secretarial Letter provided that Comments to the Data Responses should be filed within ten (10) days and that Reply Comments should be filed five (5) days thereafter.

The OCA has reviewed the data submitted by UGI, and the OCA's position remains the same as it was in our October 20, 2021 comments filed in the above-referenced dockets. As a result of the OCA's review of the Companies' Supplemental Information responses, the Companies' interrogatory responses, and the facts of this filing, the OCA supports the proposed changes to the energy burdens in this case. Due to the relatively low increase in costs to the energy burdens, the OCA does not believe at this time that additional cost control measures are necessary. The OCA specifically reserves the right to raise the need for additional cost control measures and to re-examine the identified energy burdens in the Company's next Universal Service and Energy Conservation Plan proceeding.

Rosemary Chiavetta, Secretary

March 4, 2022

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

Respectfully submitted,

/s/ Christy M. Appleby

Christy M. Appleby

Assistant Consumer Advocate

PA Attorney I.D. # 85824

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Enclosures:

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

*325027

CERTIFICATE OF SERVICE

Re: 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 : Docket No. P-2020-3019196
Petition to Amend Universal Service and :
Energy Conservation Plan for 2020-2025 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter Re: In Response to UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc. – Electric Division Data Responses, 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 4th day of March 2022.

SERVICE BY E-MAIL ONLY

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Dated: March 4, 2022
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