



March 4, 2022

**VIA E-FILE**

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**

***Comments of CAUSE-PA***

Dear Secretary Chiavetta:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its attorneys at the Pennsylvania Utility Law Project, file the following brief comments pursuant to the February 11, 2022, Secretarial Letter (February Secretarial Letter), which invited interested parties to submit Comments and Reply Comments to additional information requested by the Commission related to the UGI Utilities, Inc. (UGI or the Company) Universal Service and Energy Conservation Plan for 2020 - 2025 (UGI's USECP or Plan).

On February 22, 2022, UGI responded to the February Secretarial Letter, providing additional requested information. For the purposes of this Letter, CAUSE-PA adopts the abbreviated procedural history as stated in the February Secretarial Letter. Further, for brevity, CAUSE-PA will not reiterate arguments raised in Initial Comments or Reply Comments but incorporates those arguments by reference herein.

CAUSE-PA reviewed UGI's response to the February Secretarial Letter and asserts that the information and data provided reasonably addresses and resolves outstanding questions posed by the Commission. Further, this supplemental data does not indicate material differences in costs to implement the proposed amended PIP energy burdens for UGI's customer assistance program (CAP). Indeed, the data underscores our prior finding that UGI's Plan is just and reasonable in light of the significant benefits that will be realized by those experiencing considerable economic hardship.

CAUSE-PA strongly supports UGI's proposal to amend its CAP energy burden standards to align with the energy burden standards set forth in the Commission's Final CAP Policy Statement.<sup>1</sup> UGI's proposed amendments will greatly improve affordability for the majority of the Company's CAP customers and will more accurately target affordability based on a household's ability to pay. Further, UGI's proposed amendments will more equitably distribute CAP benefits to low income households and will allow the most economically vulnerable CAP customers with the lowest household incomes (at or below 50% FPL) to realize considerable improvements in affordability. These critical reforms will help ensure that households with the greatest need can reasonably afford to maintain service to their homes. In addition, the data collected throughout this proceeding highlights that – on balance – implementation costs are well worth the benefits realized by those who experience disproportionate economic hardships.

CAUSE-PA therefore stands by its position that the proposed Plan is just and reasonable and should be approved by the Commission because it will help to ensure UGI's low income customers are able to stay connected to and afford life-sustaining utility services. Thus, CAUSE-PA urges the Commission to approve UGI's Amended USECP without delay, in a manner consistent with our previously submitted Comments and Reply Comments.

Respectfully Submitted,  
**Pennsylvania Utility Law Project**



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March 4, 2022

CC: *(Via E-Mail Only)*  
Certificate of Service  
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<sup>1</sup> 2019 Amendments to CAP Policy Statement, Final Policy Statement and Order, Docket No. M-2019-3012599

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this day, served copies of the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above captioned matter in the manner and upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

<b>VIA EMAIL</b>	
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Respectfully submitted,



Dated: March 4, 2022

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