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August 15, 2022

**VIA ELECTRONIC FILING**

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 No. M-2019-3014966**

**UGI Utilities, Inc.’s Petition to Amend Universal Service and Energy  
Conservation Plan for 2020 – 2025; Docket No. P-2020-3019196**

Dear Secretary Chiavetta:

**I. BACKGROUND**

On January 16, 2020, the Pennsylvania Public Utility Commission (“Commission”) approved UGI Utilities, Inc. – Electric and Gas Divisions’ (“UGI” or the “Company”) 2020-2025 Universal Service and Energy Conservation Plan (“USECP”) at Docket No. M-2019-3014966.

On May 21, 2020, UGI filed a Petition to Amend its 2020-2025 USECP at Docket No. P-2020-3019196 (“Petition”). On June 16, 2022, the Commission entered an Order at Docket Nos. M-2019-30122599 and P-2020-3019196, which approved the Petition (“Order”). The Order directed UGI to file CAP Credit Evaluation Reports for 2019-2021 (“Reports”), within 60 days of the date of the Order. The Order also explained that UGI previously was required to file these Reports by April 1 each year, pursuant to the Commission’s August 8, 2019 Order approving the Company’s prior USECP, which was in effect between 2018 and 2020.<sup>1</sup> However, the Company did not file these reports. Accordingly, the Order is now requiring UGI to file them.

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<sup>1</sup> See *Universal Service and Energy Conservation Plan for 2018-2020 for former UGI South, UGI Central, UGI North, and UGI Electric*, Docket Nos. M-2017-2598190, M-2017-2637094, M-2017-2637095 and M-2017-2637098, pp. 47-48 (Order entered Aug. 8, 2019).

The August 8, 2019 Order directed UGI to include the following data points in the Reports by subsidiary, Federal Poverty Income Guideline (“FPIG”) level, and account type:

- a.) CAP Customer Participation Rate;
- b.) Average Annual CAP Credits;
- c.) Number of CAP accounts that exceeded the previous maximum CAP Credit limit;
- d.) Total dollars above previous maximum CAP Credit limit;
- e.) Average CAP credits above previous maximum CAP Credits;
- f.) Gross Write-Offs in Dollars by Residential Customers and Confirmed Low-Income Customers; and
- g.) The difference in pre-CAP and current energy usage (+/-) of CAP customers who exceeded energy usage thresholds but received energy conservation assistance (stated as an average yearly percentage).

August 8, 2019 Order at 47-48.

Additionally, the current USECP Order directed UGI to include the following supplemental information in the Reports:

- 1) Average annual residential customers;
- 2) Average annual CAP enrollments;
- 3) Average annual non-CAP residential customers;
- 4) Total annual CAP costs; and
- 5) CAP costs broken down by type (i.e., administration, arrearage forgiveness, and CAP credits).

Accordingly, UGI hereby files its CAP Credit Evaluation Reports for 2019-2021 that includes the information requested in the current USECP Order and the August 9, 2019 Order. See Exhibit A attached hereto (as detailed herein).

## II. INFORMATION BY FPIG

The Reports are to include the data sought in the August 8, 2019 Order (subparts a-g above) for the former UGI Rate Districts and by FPIG level. However, the Company does not have all of the required information for the Reports separated by FPIG level, due to the difficulty in obtaining this level of data, especially for 2019. The Company’s billing system was not designed to capture this data by such FPIG designations.

Therefore, for the purpose of filing the Reports in accordance with the Order, UGI is submitting the data (in subparts a-g above) for the former UGI Rate Districts with FPIG designations to the extent possible. Specifically, UGI is providing FPIG level data for 2020 and 2021<sup>2</sup> for the following categories:

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<sup>2</sup> UGI is in the process of gathering this FPIG level detail for 2019 and will provide it as a Supplement to this filing by September 2, 2022. Similarly, the Company is still gathering the data by FPIG level for Subparts 1-5 above and will provide it as a Supplement to this filing by September 2, 2022.

- Average Annual CAP Credits (Subpart b)
- Number of CAP accounts that exceeded the previous maximum CAP Credit limit (Subpart c)
- Total dollars above previous maximum CAP Credit limit (Subpart d)
- Average CAP credits above previous maximum CAP Credits (Subpart e)
- The difference in pre-CAP and current energy usage (+/-) of CAP customers who exceeded energy usage thresholds but received energy conservation assistance (stated as an average yearly percentage), which appears as “Pre & Post CAP Usage YOY Change (Stated as Avg. Yearly)” in Exhibit A (Subpart g)

For subpart g (*i.e.*, Pre & Post CAP Usage YOY Change (Stated as Avg. Yearly)) in the Reports, the Company is working to prepare this data by FPIG level. However, the Company is only able to obtain the data by FPIG level for Residential Heating customers. Because this information is not yet ready, the Company will provide this data in a Supplement to this filing by September 2, 2022.

Regarding the remaining FPIG level data, the Company is working with its Information Technology Department and a third-party vendor, Deloitte, in an effort to develop the remaining data by FPIG level. To the extent the Company is able to obtain this data by FPIG level, it will file a Supplement to the Reports by September 2, 2022. To the extent the Company is unable to obtain all of the remaining FPIG level data, it will inform the Commission by the same date.

Very truly yours,

/s/ Michael S. Swerling  
 Michael S. Swerling  
 Counsel for UGI

Enclosure

cc: Certificate of Service (parties to the USECP Proceeding)  
 Joseph Magee, Bureau of Consumer Services, *via email*, [jmagee@pa.gov](mailto:jmagee@pa.gov)  
 Jennifer Johnson, Bureau of Consumer Services, *via email*,  
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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 Service	:	Docket No. P-2020-3019196
and Energy Conservation Plan for	:	
2020-2025	:	

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CERTIFICATE OF SERVICE

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I hereby certify that I have, this 15th day of August 2022, served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**VIA ELECTRONIC MAIL:**

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/s/ Michael S. Swerling  
Michael S. Swerling

CAP Credit Evaluation Report - 2019 Summary

CY 2019	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total	Average Annual
<b>Actual Annual Residential Customers as of 12/31</b>					
<b>UGI South</b>	N/A	N/A	N/A	648,689	641,782
- Heating	N/A	N/A	N/A	365,233	360,656
- Non Heating	N/A	N/A	N/A	344,886	337,748
<b>UGI North</b>				20,347	22,908
- Heating				155,756	154,339
- Non Heating	N/A	N/A	N/A	149,996	148,733
<b>UGI Central</b>				5,760	5,606
- Heating	N/A	N/A	N/A	73,162	72,299
- Non Heating	N/A	N/A	N/A	70,741	69,966
<b>UGI Electric</b>				2,421	2,333
- Heating	N/A	N/A	N/A	54,538	54,488
- Non Heating	N/A	N/A	N/A	10,197	10,182
				44,341	44,305
<b>Actual Annual CAP Enrollments</b>					
<b>UGI South</b>				11,387	949
- Heating				11,048	921
- Non Heating				339	28
<b>UGI North</b>				7,641	637
- Heating				7,516	626
- Non Heating				125	10
<b>UGI Central</b>				2,867	239
- Heating				2,850	238
- Non Heating				17	1
<b>UGI Electric</b>				3,200	267
- Heating				1,092	91
- Non Heating				2,108	176
<b>Average Annual non-CAP Residential Customers</b>					
<b>UGI South</b>	N/A	N/A	N/A	353,846	359,707
- Heating	N/A	N/A	N/A	333,838	336,827
- Non Heating	N/A	N/A	N/A	20,008	22,880
<b>UGI North</b>	N/A	N/A	N/A	148,115	153,702
- Heating	N/A	N/A	N/A	142,480	148,107
- Non Heating	N/A	N/A	N/A	5,635	5,595
<b>UGI Central</b>	N/A	N/A	N/A	70,295	72,060
- Heating	N/A	N/A	N/A	67,891	69,728
- Non Heating	N/A	N/A	N/A	2,404	2,332
<b>UGI Electric</b>	N/A	N/A	N/A	51,338	54,221
- Heating	N/A	N/A	N/A	9,105	10,091
- Non Heating	N/A	N/A	N/A	42,233	44,130
<b>CAP Participation Rate</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b>Total Annual CAP Costs</b>					
<b>Admin (All Areas)</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b>Arrearage Forgiveness</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b>CAP Credits</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b># of CAP Credits</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b>Average Annual CAP Credits</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					
<b>Gross Residential Write-Offs</b>					
All Natural Gas	N/A	N/A	N/A	\$18,792,928.00	
Electric	N/A	N/A	N/A	\$1,717,271.00	
<b>Gross Residential Write-Offs Confirmed Low Income Customers</b>					
All Natural Gas	N/A	N/A	N/A	\$316,966.00	
Electric	N/A	N/A	N/A	\$19,746.00	
<b>Pre &amp; Post CAP Usage YOY Change (Stated as avg yearly %)</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					

**CAP Credit Evaluation Report - 2021 Summary**

<b>CY 2020</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>Actual Annual Residential Customers as of 12/31</b>	N/A	N/A	N/A	656,831	652,778
<b>UGI South</b>	N/A	N/A	N/A	372,403	368,350
- Heating	N/A	N/A	N/A	348,749	344,953
- Non Heating	N/A	N/A	N/A	23,654	23,397
<b>UGI North</b>	N/A	N/A	N/A	156,253	156,253
- Heating	N/A	N/A	N/A	150,578	150,578
- Non Heating	N/A	N/A	N/A	5,675	5,675
<b>UGI Central</b>	N/A	N/A	N/A	73,490	73,490
- Heating	N/A	N/A	N/A	71,118	71,118
- Non Heating	N/A	N/A	N/A	2,372	2,372
<b>UGI Electric</b>	N/A	N/A	N/A	54,685	54,685
- Heating	N/A	N/A	N/A	10,219	10,219
- Non Heating	N/A	N/A	N/A	44,466	44,466
<b>Actual Annual CAP Enrollments</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>UGI South</b>	3,519	5,195	2,985	11,699	975
- Heating	3,427	5,027	2,914	11,368	947
- Non Heating	92	168	71	331	28
<b>UGI North</b>	2,160	3,733	2,350	8,243	687
- Heating	2,132	3,691	2,331	8,154	680
- Non Heating	28	42	19	89	7
<b>UGI Central</b>	608	1,445	996	3,049	254
- Heating	606	1,440	993	3,039	253
- Non Heating	2	5	3	10	1
<b>UGI Electric</b>	1,102	1,297	772	3,171	264
- Heating	469	480	237	1,186	99
- Non Heating	633	817	535	1,985	165
<b>Average Annual non-CAP Residential Customers</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>UGI South</b>	N/A	N/A	N/A	360,704	367,375
- Heating	N/A	N/A	N/A	337,381	344,006
- Non Heating	N/A	N/A	N/A	23,323	23,369
<b>UGI North</b>	N/A	N/A	N/A	148,010	155,566
- Heating	N/A	N/A	N/A	142,424	149,898
- Non Heating	N/A	N/A	N/A	5,586	5,668
<b>UGI Central</b>	N/A	N/A	N/A	70,441	73,236
- Heating	N/A	N/A	N/A	68,079	70,865
- Non Heating	N/A	N/A	N/A	2,362	2,371
<b>UGI Electric</b>	N/A	N/A	N/A	51,514	54,421
- Heating	N/A	N/A	N/A	9,033	10,120
- Non Heating	N/A	N/A	N/A	42,481	44,300
<b>CAP Participation Rate</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	N/A	N/A	N/A	3%	
- Heating	N/A	N/A	N/A	3%	
- Non Heating	N/A	N/A	N/A	1%	
<b>UGI North</b>	N/A	N/A	N/A	5%	
- Heating	N/A	N/A	N/A	5%	
- Non Heating	N/A	N/A	N/A	2%	
<b>UGI Central</b>	N/A	N/A	N/A	4%	
- Heating	N/A	N/A	N/A	4%	
- Non Heating	N/A	N/A	N/A	0%	
<b>UGI Electric</b>	N/A	N/A	N/A	6%	
- Heating	N/A	N/A	N/A	12%	
- Non Heating	N/A	N/A	N/A	4%	
<b>Total Annual CAP Costs</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>Admin (All Areas)</b>	\$170,519.68	\$272,418.91	\$166,537.81	\$609,476.40	
<b>UGI South*</b>	\$73,467.54	\$108,458.05	\$62,319.01	\$244,244.60	
- Heating	\$71,546.82	\$104,950.65	\$60,836.72	\$237,334.18	
- Non Heating	\$1,920.72	\$3,507.40	\$1,482.29	\$6,910.42	
<b>UGI North*</b>	\$60,794.53	\$105,067.58	\$66,142.19	\$232,004.30	
- Heating	\$60,006.45	\$103,885.46	\$65,607.43	\$229,499.34	
- Non Heating	\$788.08	\$1,182.12	\$534.77	\$2,504.96	
<b>UGI Central*</b>	\$13,519.99	\$32,132.22	\$22,147.88	\$67,800.10	
- Heating	\$13,475.52	\$32,021.04	\$22,081.17	\$67,577.73	
- Non Heating	\$44.47	\$111.18	\$66.71	\$222.37	
<b>UGI Electric*</b>	\$22,737.62	\$26,761.07	\$15,928.71	\$65,427.40	
- Heating	\$9,676.90	\$9,903.86	\$4,890.03	\$24,470.80	
- Non Heating	\$13,060.72	\$16,857.20	\$11,038.68	\$40,956.60	
<b>Arrearage Forgiveness</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$418,600.94	\$544,023.58	\$343,924.26	\$1,306,548.78	
- Heating	\$408,884.88	\$529,583.00	\$337,607.33	\$1,276,075.21	
- Non Heating	\$9,716.06	\$14,440.58	\$6,316.93	\$30,473.57	
<b>UGI North</b>	\$312,834.51	\$403,444.21	\$265,915.05	\$982,193.77	
- Heating	\$310,874.84	\$400,146.27	\$263,870.14	\$974,891.25	
- Non Heating	\$1,959.67	\$3,297.94	\$2,044.91	\$7,302.52	
<b>UGI Central</b>	\$72,243.48	\$148,065.71	\$121,628.94	\$341,938.13	
- Heating	\$72,243.48	\$147,680.73	\$121,395.94	\$341,320.15	
- Non Heating	\$0.00	\$384.98	\$233.00	\$617.98	
<b>UGI Electric</b>	\$166,579.10	\$176,790.38	\$109,947.92	\$453,317.40	
- Heating	\$66,963.29	\$59,181.12	\$34,170.69	\$160,315.10	
- Non Heating	\$99,615.81	\$117,609.26	\$75,777.23	\$293,002.30	
<b>CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$1,485,510.26	\$1,125,614.48	\$444,573.79	\$3,055,698.53	
- Heating	\$1,477,171.98	\$1,116,419.59	\$441,657.28	\$3,035,248.85	
- Non Heating	\$8,338.28	\$9,194.89	\$2,916.51	\$20,449.68	
<b>UGI North</b>	\$1,181,533.22	\$1,150,273.71	\$458,821.27	\$2,790,628.20	
- Heating	\$1,176,257.96	\$1,148,880.63	\$457,205.45	\$2,782,344.04	
- Non Heating	\$5,275.26	\$1,393.08	\$1,615.82	\$8,284.16	
<b>UGI Central</b>	\$251,454.30	\$327,933.49	\$149,049.27	\$728,437.06	
- Heating	\$251,119.27	\$327,867.61	\$149,024.51	\$728,011.39	
- Non Heating	\$335.03	\$665.88	\$224.76	\$425.67	
<b>UGI Electric</b>	\$941,293.16	\$723,482.89	\$275,377.11	\$1,940,153.16	
- Heating	\$473,559.58	\$337,166.49	\$111,874.24	\$922,600.31	
- Non Heating	\$467,733.58	\$386,316.40	\$163,502.87	\$1,017,552.85	
<b># of CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	20,846	28,043	17,054	65,943	
- Heating	20,345	27,170	16,681	64,196	
- Non Heating	501	873	373	1,747	
<b>UGI North</b>	13,011	20,258	13,266	46,535	
- Heating	12,851	20,078	13,168	46,097	
- Non Heating	160	180	98	438	
<b>UGI Central</b>	3,635	7,901	6,024	17,560	
- Heating	3,628	7,859	6,007	17,494	
- Non Heating	7	42	17	66	
<b>UGI Electric</b>	7,300	8,453	4,837	20,590	
- Heating	3,300	3,131	1,531	7,962	
- Non Heating	4,000	5,322	3,306	12,628	
<b>Average Annual CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$89.25	\$51.62	\$34.30	\$58.99	
- Heating	\$72.61	\$41.09	\$26.48	\$47.28	
- Non Heating	\$16.64	\$10.53	\$7.82	\$11.71	
<b>UGI North</b>	\$124.50	\$64.96	\$51.21	\$79.27	
- Heating	\$91.53	\$57.22	\$34.72	\$60.36	
- Non Heating	\$32.97	\$7.74	\$16.49	\$18.91	
<b>UGI Central</b>	\$117.08	\$43.29	\$26.26	\$48.06	
- Heating	\$69.22	\$41.72	\$24.81	\$41.61	
- Non Heating	\$47.86	\$1.57	\$1.46	\$6.45	
<b>UGI Electric</b>	\$260.44	\$180.28	\$122.53	\$196.45	
- Heating	\$143.50	\$107.69	\$73.07	\$115.88	
- Non Heating	\$116.93	\$72.59	\$49.46	\$80.58	
<b>Gross Residential Write-Offs</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
All Natural Gas	N/A	N/A	N/A	\$10,734,440.00	
Electric	N/A	N/A	N/A	\$1,217,238.00	
<b>Gross Residential Write-Offs Confirmed Low Income Customers</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
All Natural Gas	N/A	N/A	N/A	\$153,039.00	
Electric	N/A	N/A	N/A	\$11,007.00	
<b>Pre &amp; Post CAP Usage YOY Change (Stated as avg yearly %)**</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					

Part (g) in original order, to be provided as supplement.

\*Admin cost by FPIG and heating vs. non heating was calculated based on enrollment data by FPIG and heating vs. non heating.  
 \*\*Column E does not represent the sum of columns B through D

**CAP Credit Evaluation Report - 2021 Summary**

<b>CY 2021</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>Actual Annual Residential Customers as of 12/31</b>	N/A	N/A	N/A	665,501	659,054
<b>UGI South</b>	N/A	N/A	N/A	378,154	373,827
- Heating	N/A	N/A	N/A	356,708	352,626
- Non Heating	N/A	N/A	N/A	21,446	21,201
<b>UGI North</b>	N/A	N/A	N/A	157,868	156,631
- Heating	N/A	N/A	N/A	152,801	151,604
- Non Heating	N/A	N/A	N/A	5,067	5,028
<b>UGI Central</b>	N/A	N/A	N/A	74,620	73,816
- Heating	N/A	N/A	N/A	72,557	71,775
- Non Heating	N/A	N/A	N/A	2,063	2,041
<b>UGI Electric</b>	N/A	N/A	N/A	54,859	54,780
- Heating	N/A	N/A	N/A	10,354	10,339
- Non Heating	N/A	N/A	N/A	44,505	44,440
<b>Actual Annual CAP Enrollments</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>UGI South</b>	3,938	5,116	3,003	12,057	1,005
- Heating	3,829	4,939	2,928	11,696	975
- Non Heating	109	177	75	361	30
<b>UGI North</b>	2,453	3,853	2,558	8,864	739
- Heating	2,415	3,797	2,530	8,742	729
- Non Heating	38	56	28	122	10
<b>UGI Central</b>	661	1,368	961	2,990	249
- Heating	657	1,361	952	2,970	248
- Non Heating	4	7	9	20	2
<b>UGI Electric</b>	1,217	1,376	836	3,429	286
- Heating	481	493	266	1,240	103
- Non Heating	736	883	570	2,189	182
<b>Average Annual non-CAP Residential Customers</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	<b>Average Annual</b>
<b>UGI South</b>	N/A	N/A	N/A	366,097	372,822
- Heating	N/A	N/A	N/A	345,012	351,651
- Non Heating	N/A	N/A	N/A	21,085	21,171
<b>UGI North</b>	N/A	N/A	N/A	149,004	155,893
- Heating	N/A	N/A	N/A	144,059	150,875
- Non Heating	N/A	N/A	N/A	4,945	5,017
<b>UGI Central</b>	N/A	N/A	N/A	71,630	73,567
- Heating	N/A	N/A	N/A	69,587	71,527
- Non Heating	N/A	N/A	N/A	2,043	2,040
<b>UGI Electric</b>	N/A	N/A	N/A	51,430	54,494
- Heating	N/A	N/A	N/A	9,114	10,236
- Non Heating	N/A	N/A	N/A	42,316	44,258
<b>CAP Participation Rate</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	N/A	N/A	N/A	3%	
- Heating	N/A	N/A	N/A	3%	
- Non Heating	N/A	N/A	N/A	2%	
<b>UGI North</b>	N/A	N/A	N/A	6%	
- Heating	N/A	N/A	N/A	6%	
- Non Heating	N/A	N/A	N/A	2%	
<b>UGI Central</b>	N/A	N/A	N/A	4%	
- Heating	N/A	N/A	N/A	4%	
- Non Heating	N/A	N/A	N/A	1%	
<b>UGI Electric</b>	N/A	N/A	N/A	6%	
- Heating	N/A	N/A	N/A	12%	
- Non Heating	N/A	N/A	N/A	5%	
<b>Total Annual CAP Costs</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>Admin (All Areas)</b>	\$225,040.18	\$318,586.18	\$200,502.54	\$744,128.90	
<b>UGI South*</b>	\$100,241.94	\$130,227.98	\$76,441.48	\$306,911.40	
- Heating	\$97,467.34	\$125,722.44	\$74,532.35	\$297,722.13	
- Non Heating	\$2,774.60	\$4,505.54	\$1,909.13	\$9,189.27	
<b>UGI North*</b>	\$73,901.22	\$116,078.84	\$77,064.54	\$267,044.60	
- Heating	\$72,756.40	\$114,391.74	\$76,220.99	\$263,369.12	
- Non Heating	\$1,144.82	\$1,687.10	\$843.55	\$3,675.48	
<b>UGI Central*</b>	\$15,690.73	\$32,473.39	\$22,812.08	\$70,976.20	
- Heating	\$15,595.77	\$32,307.23	\$22,598.44	\$70,501.44	
- Non Heating	\$94.95	\$166.17	\$213.64	\$474.76	
<b>UGI Electric*</b>	\$35,206.29	\$39,805.97	\$24,184.44	\$99,196.70	
- Heating	\$13,914.73	\$14,261.88	\$7,695.05	\$35,871.66	
- Non Heating	\$21,291.56	\$25,544.09	\$16,489.39	\$63,325.04	
<b>Arrearage Forgiveness</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$492,377.27	\$591,953.81	\$374,535.72	\$1,458,866.80	
- Heating	\$481,211.21	\$573,903.84	\$366,526.98	\$1,421,642.03	
- Non Heating	\$11,166.06	\$18,049.97	\$8,008.74	\$37,224.77	
<b>UGI North</b>	\$401,327.13	\$464,580.84	\$314,791.57	\$1,180,699.54	
- Heating	\$398,143.54	\$459,309.82	\$311,473.03	\$1,168,926.39	
- Non Heating	\$3,183.59	\$5,271.02	\$3,318.54	\$11,773.15	
<b>UGI Central</b>	\$89,178.53	\$141,450.30	\$117,057.40	\$347,686.23	
- Heating	\$88,834.88	\$140,627.45	\$116,400.23	\$345,862.56	
- Non Heating	\$343.65	\$822.85	\$657.17	\$1,823.67	
<b>UGI Electric</b>	\$202,818.68	\$225,422.44	\$141,730.83	\$569,971.95	
- Heating	\$68,846.63	\$73,802.85	\$40,536.38	\$183,185.86	
- Non Heating	\$133,972.05	\$151,619.59	\$101,194.45	\$386,786.09	
<b>CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$1,733,990.71	\$981,584.49	\$356,935.27	\$3,072,510.47	
- Heating	\$1,715,264.79	\$969,344.29	\$351,665.43	\$3,036,274.51	
- Non Heating	\$18,725.92	\$12,240.20	\$5,269.84	\$36,235.96	
<b>UGI North</b>	\$1,435,434.46	\$1,109,265.58	\$404,932.44	\$2,949,632.48	
- Heating	\$1,429,787.46	\$1,107,081.58	\$395,262.44	\$2,932,131.48	
- Non Heating	\$5,647.00	\$2,184.00	\$9,670.00	\$17,501.00	
<b>UGI Central</b>	\$298,339.06	\$277,247.70	\$114,470.14	\$690,056.90	
- Heating	\$297,372.37	\$276,650.00	\$113,767.89	\$687,790.26	
- Non Heating	\$966.69	\$597.70	\$702.25	\$2,266.64	
<b>UGI Electric</b>	\$1,127,781.85	\$766,568.97	\$266,112.03	\$2,160,462.85	
- Heating	\$511,289.71	\$334,796.93	\$106,119.76	\$952,206.40	
- Non Heating	\$616,492.14	\$431,772.04	\$159,992.27	\$1,208,256.45	
<b># of CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	22,114	24,484	14,537	61,135	
- Heating	21,600	23,582	14,128	59,310	
- Non Heating	514	902	409	1,825	
<b>UGI North</b>	14,895	19,155	12,596	46,646	
- Heating	14,723	18,912	12,473	46,108	
- Non Heating	172	243	123	538	
<b>UGI Central</b>	3,730	6,382	4,742	14,854	
- Heating	3,720	6,342	4,698	14,760	
- Non Heating	10	40	44	94	
<b>UGI Electric</b>	7,927	8,262	4,737	20,926	
- Heating	3,360	2,890	1,435	7,685	
- Non Heating	4,567	5,372	3,302	13,241	
<b>Average Annual CAP Credits</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
<b>UGI South</b>	\$115.84	\$54.68	\$37.78	\$71.05	
- Heating	\$79.41	\$41.11	\$24.89	\$51.19	
- Non Heating	\$36.43	\$13.57	\$12.88	\$19.86	
<b>UGI North</b>	\$129.94	\$67.53	\$110.31	\$96.12	
- Heating	\$97.11	\$58.54	\$31.69	\$63.59	
- Non Heating	\$32.83	\$8.99	\$78.62	\$32.53	
<b>UGI Central</b>	\$176.61	\$58.56	\$40.18	\$70.71	
- Heating	\$79.94	\$43.62	\$24.22	\$46.60	
- Non Heating	\$96.67	\$14.94	\$15.96	\$24.11	
<b>UGI Electric</b>	\$287.16	\$196.22	\$122.40	\$215.16	
- Heating	\$152.17	\$115.85	\$73.95	\$123.90	
- Non Heating	\$134.99	\$80.37	\$48.45	\$91.25	
<b>Gross Residential Write-Offs</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
All Natural Gas	N/A	N/A	N/A	\$16,204,625.00	
Electric	N/A	N/A	N/A	\$1,540,628.00	
<b>Gross Residential Write-Offs Confirmed Low Income Customers</b>	<b>FPIG 0%-50%</b>	<b>FPIG 51%-100%</b>	<b>FPIG 101%-150%</b>	<b>Total</b>	
All Natural Gas	N/A	N/A	N/A	\$161,100.00	
Electric	N/A	N/A	N/A	\$13,609.00	
<b>Pre &amp; Post CAP Usage YOY Change (Stated as avg yearly %)**</b>					
<b>UGI South</b>					
- Heating					
- Non Heating					
<b>UGI North</b>					
- Heating					
- Non Heating					
<b>UGI Central</b>					
- Heating					
- Non Heating					
<b>UGI Electric</b>					
- Heating					
- Non Heating					

Part (g) in original order, to be provided as supplement.

\*Admin cost by FPIG and heating vs. non heating was calculated based on enrollment data by FPIG and heating vs. non heating.  
 \*\*Column E does not represent the sum of columns B through D

## Max Credit Data - Response to Sub-parts C through E - All FPIG Levels

### 2019 - All

Line Item C

Line Item D

Line Item E

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	723	\$273,304.00	\$378
	Non Heating	\$ 560.00	11	\$4,536.00	\$412
UGI North	Heating	\$ 950.00	658	\$298,493.00	\$454
	Non Heating	\$ 560.00	4	\$1,783.00	\$446
UGI Central	Heating	\$ 950.00	309	\$154,106.00	\$499
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	347	\$294,740.00	\$849
	Non Heating	\$ 700.00	535	\$459,184.00	\$858

### 2020

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	596	\$208,742.25	\$350
	Non Heating	\$ 560.00	5	\$1,837.15	\$367
UGI North	Heating	\$ 950.00	644	\$245,694.86	\$382
	Non Heating	\$ 560.00	5	\$1,103.93	\$221
UGI Central	Heating	\$ 950.00	112	\$31,877.61	\$285
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	289	\$197,311.25	\$683
	Non Heating	\$ 700.00	512	\$373,746.46	\$730

### 2021

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	635	\$221,479.22	\$349
	Non Heating	\$ 560.00	19	\$5,516.94	\$290
UGI North	Heating	\$ 950.00	818	\$346,668.98	\$424
	Non Heating	\$ 560.00	4	\$942.39	\$236
UGI Central	Heating	\$ 950.00	147	\$56,641.57	\$385
	Non Heating	\$ 560.00	1	\$198.42	\$198
UGI Electric	Heating	\$ 1,200.00	286	\$219,676.25	\$768
	Non Heating	\$ 700.00	585	\$477,901.19	\$817

**Max Credit Data - Response to Sub-parts C through E - Level 1 (0 - 50% FPL)**

**2019 - FPIG Level 1**

Line Item C

Line Item D

Line Item E

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	<b>To be provided as supplement.</b>		
	Non Heating	\$ 560.00			
UGI North	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Central	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Electric	Heating	\$ 1,200.00			
	Non Heating	\$ 700.00			

**2020 - FPIG Level 1**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	401	\$138,133.98	\$344
	Non Heating	\$ 560.00	2	\$394.72	\$197
UGI North	Heating	\$ 950.00	378	\$154,353.53	\$408
	Non Heating	\$ 560.00	4	\$1,014.96	\$254
UGI Central	Heating	\$ 950.00	54	\$15,549.35	\$288
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	159	\$108,524.78	\$683
	Non Heating	\$ 700.00	247	\$192,979.96	\$781

**2021 - FPIG Level 1**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	471	\$166,323.85	\$353
	Non Heating	\$ 560.00	9	\$3,237.24	\$360
UGI North	Heating	\$ 950.00	520	\$228,245.55	\$439
	Non Heating	\$ 560.00	3	\$937.83	\$313
UGI Central	Heating	\$ 950.00	81	\$35,569.98	\$439
	Non Heating	\$ 560.00	1	\$198.42	\$198
UGI Electric	Heating	\$ 1,200.00	165	\$128,678.42	\$780
	Non Heating	\$ 700.00	304	\$277,875.02	\$914

**Max Credit Data - Response to Sub-parts C through E - Level 2 (51 - 100% FPL)**

**2019 - FPIG Level 2**

Line Item C

Line Item D

Line Item E

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	<b>To be provided as supplement.</b>		
	Non Heating	\$ 560.00			
UGI North	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Central	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Electric	Heating	\$ 1,200.00			
	Non Heating	\$ 700.00			

**2020 - FPIG Level 2**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	144	\$52,813.34	\$367
	Non Heating	\$ 560.00	2	\$856.45	\$428
UGI North	Heating	\$ 950.00	218	\$73,865.57	\$339
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Central	Heating	\$ 950.00	41	\$13,719.54	\$335
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	101	\$70,487.32	\$698
	Non Heating	\$ 700.00	184	\$138,275.62	\$751

**2021 - FPIG Level 2**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	129	\$43,741.56	\$339
	Non Heating	\$ 560.00	7	\$1,519.57	\$217
UGI North	Heating	\$ 950.00	257	\$95,195.84	\$370
	Non Heating	\$ 560.00	1	\$4.56	\$5
UGI Central	Heating	\$ 950.00	52	\$17,874.74	\$344
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	96	\$73,171.68	\$762
	Non Heating	\$ 700.00	208	\$155,541.48	\$748

**Max Credit Data - Response to Sub-parts C through E - Level 3 (101 - 150% FPL)**

**2019 - FPIG Level 3**

Line Item C

Line Item D

Line Item E

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	<b>To be provided as supplement.</b>		
	Non Heating	\$ 560.00			
UGI North	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Central	Heating	\$ 950.00			
	Non Heating	\$ 560.00			
UGI Electric	Heating	\$ 1,200.00			
	Non Heating	\$ 700.00			

**2020 - FPIG Level 3**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	51	\$17,794.93	\$349
	Non Heating	\$ 560.00	1	\$585.98	\$586
UGI North	Heating	\$ 950.00	48	\$17,475.76	\$364
	Non Heating	\$ 560.00	1	\$88.97	\$89
UGI Central	Heating	\$ 950.00	17	\$2,608.72	\$153
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	29	\$18,299.15	\$631
	Non Heating	\$ 700.00	81	\$42,490.88	\$525

**2021 - FPIG Level 3**

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	35	\$11,413.81	\$326
	Non Heating	\$ 560.00	3	\$760.13	\$253
UGI North	Heating	\$ 950.00	41	\$23,227.59	\$567
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Central	Heating	\$ 950.00	14	\$3,196.85	\$228
	Non Heating	\$ 560.00	0	\$0.00	\$0
UGI Electric	Heating	\$ 1,200.00	25	\$17,826.15	\$713
	Non Heating	\$ 700.00	73	\$44,484.69	\$609