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March 4, 2024

VIA E-FILE & E-MAIL

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: UGI Revised Joint 2020-2025 Universal Service and Energy Conservation Plan;
Docket Nos. M-2019-3014966 and P-2020-3019196; and
UGI Electric 2022 Base Rate Case, Docket Nos. R-2022-3037368, et al.**

Dear Ms. Chiavetta:

On September 21, 2023, the Pennsylvania Public Utility Commission (“Commission”) entered an Order in UGI Utilities, Inc. – Electric Division’s (“UGI Electric” or the “Company”) 2023 Electric Base Rate Case at Docket No. R-2022-3037368, et al. The Order approved the terms and conditions of the Joint Petition for Approval of Settlement of All Issues (“Settlement”) in the 2023 Electric Base Rate Case. The Settlement included Universal Service provisions, which require revisions to the Company’s existing Universal Service and Energy Conservation Plan (“USECP”) for 2020-2025, established in Docket Nos. M-2019-3014966 and P-2020-3019196. Accordingly, UGI Electric hereby submits a revised USECP (in redline and clean formats) to incorporate certain provisions as approved in the Commission’s Order for the 2023 Electric Rate Case.

USECP REVISIONS PURSUANT TO 2023 ELECTRIC RATE CASE SETTLEMENT

Settlement Paragraph 58. Hardship Fund (Operation Share) states:

Effective January 1, 2024, the Company will expand eligibility of the Electric Operation Share grant program from 200% Federal Poverty Level (“FPL”) to 250% FPL and will increase its annual funding contribution by \$30,000. This will bring the Company’s annual funding for Operation Share to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding. Effective January 1, 2024, the Company will also increase the maximum grant size from \$400 to \$600, to the extent funds are available.

The provisions of the Settlement set forth in this section appear on the following pages of the enclosed USECP:

- Paragraph 58: Pages 5, 14, and 15 of the revised USECP.

Settlement Paragraph 59. Low Income Usage Reduction Program (“LIURP”) states

As a part of this Settlement, UGI Electric agrees that:

- a) Within 60 days after a final order is entered in this proceeding, UGI Electric will issue a Request For Proposal (“RFP”) seeking an additional LIURP resource(s) that is able to perform 20 additional baseload and 10 additional heating jobs annually. Organizations that would be sent the RFP shall include community-based-organizations in the Company’s service territory. UGI Electric shall provide an update on the results of the RFP during its first Universal Service Advisory Committee (“USAC”) meeting after the RFP is completed. All associated incremental costs shall be recoverable as expanded through Rider USP as LIURP costs.
- b) Effective January 1, 2024, UGI Electric will expand its Electric LIURP heating and baseload job access to customers between 151% and 200% FPL; a limit of 20% of the overall LIURP budget shall apply for jobs related to customers falling between 151% and 200% FPL.

The provisions of the Settlement set forth in this section appear on the following pages of the enclosed USECP:

- Paragraph 59(a): Pages 10, 33-34, of the revised USECP.
- Paragraph 59(b): Pages 10 and 34 of the revised USECP.

Settlement Paragraph 60. Customer Assistance Program (“CAP”), Winter Moratorium, and Low-Income Home Energy Assistance Program (“LIHEAP”) states:

As a part of this Settlement, UGI Electric agrees that:

- a) UGI Electric will solicit customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company’s CAP 2 times a year until at least the effective date of the Company’s next Universal Service and Energy Conservation Plan (“USECP”). For each solicitation, UGI Electric will provide an update to the USAC on the results of the solicitation.
- b) UGI Electric will accept verbal self-reported income eligibility for customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period. No fewer than two times a year, the Company will provide an update to the USAC of the number of customers identified through such verbal self reported income.
- c) At such time that the Pennsylvania Department of Human Services (“DHS”) notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, UGI Electric will implement required modifications to its IT system and processes, within a

reasonable time frame, such that it may utilize that data to automatically enroll non-shopping LIHEAP recipients into CAP and/or recertify their income and eligibility. Until such time as IT system and process changes are made, the Company will use best efforts to implement manual processing as soon as practicable, not to exceed three (3) months from the date data is first received. All related costs to modify IT systems and processes shall be eligible for timely recovery through the Company's Rider USP as CAP costs, including any related interim costs related to manual processing. All automatically enrolled LIHEAP recipients will be deemed by UGI Electric as confirmed low-income customers and will be eligible for winter shutoff protections.

- d) UGI Electric will conduct an interim pilot to auto-enroll non-shopping customers who receive LIHEAP into CAP, pending implementation of the auto-enrollment process identified in Paragraph 60(c). The interim pilot will contain the following elements:
 - i) UGI Electric will auto-enroll non-shopping customers who received LIHEAP during the 2022/2023 LIHEAP season and will continue to enroll new LIHEAP recipients during each subsequent LIHEAP season until the time that DHS begins sharing LIHEAP income participant data with utilities (as described in Paragraph 60(c)).
 - ii) Auto-enrolled customers will be placed on CAP under the average bill methodology, unless they provide the Company with proof of income documentation demonstrating qualification for the opportunity to be placed on the lesser of a percent of income ("PIP") bill or minimum bill amount.
 - iii) Auto-enrolled customers will receive a notification by mail or email as applicable from the Company explaining: (a) the reason for the auto-enrollment; (b) the ability to opt-out of the auto-enrollment; and (c) the opportunity to be placed on the lesser of the CAP minimum bill or PIP bill by providing proof of income.
 - iv) iv) Auto-enrolled customers will be required to recertify their CAP enrollment one year after they are auto-enrolled.
 - v) Auto-enrolled customers, who are enrolled through the interim pilot and for whom UGI Electric later receives detailed income information from DHS through the data-sharing process identified in Paragraph 60(c), will be transitioned to the best available CAP rate (*i.e.*, PIP, average bill, or minimum bill).
 - vi) Auto-enrolled CAP customers with arrearages less than \$300 at the time of auto-enrollment will be eligible to include their pre-program arrearage ("PPA") debt forgiveness if they later reenroll in the program.

- vii) Auto-enrolled customers will be eligible for a one-time payment arrangement (after they leave or are otherwise removed from CAP) on arrears incurred while enrolled in CAP at the average bill rate.
- e) Within 30 days of a final order in this proceeding, UGI Electric will convene a collaborative with interested parties to this proceeding to identify the following:
 - i) The manner and method of outreach and education for auto-enrolled customers to verify their income and inform them of the program rights and responsibilities.
 - ii) Data points that can be tracked to measure the effectiveness of the pilot program.
 - iii) Associated pilot program action dates related to outreach, education, and auto-enrollment start.
 - iv) During the term of the interim pilot, UGI Electric will provide updates during each USAC meeting regarding the data points identified in Paragraph 60(e)(ii) to determine whether adjustments to the pilot are necessary.
 - v) The pilot program will cease operation if and when the terms of Paragraph 60(c) take effect.

The provisions of the Settlement set forth in this section appear on the following pages of the revised USECP.

- Paragraph 60 (a-b): Pages 4, 7, 17-18, and 24 of the revised USECP.
- Paragraph 60 (c-d): Pages 4, 7-8, and 19-20 of the revised USECP.
- Paragraph 60 (e): Pages 8-9, and 20 of the revised USECP.

Sincerely,

/s/ Michael S. Swerling
Michael S. Swerling

Enclosures: Supporting Information
 Certificate of Service

Cc: Paul T. Diskin, Director of TUS
 Darren Gill, Deputy Director of TUS
 Jeremy Haring, Fixed Utility Financial Analyst

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | | |
|--|---|-------------|------------------|
| UGI Utilities, Inc.'s Universal | : | | |
| Service and Energy Conservation Plan for | : | Docket Nos. | M-2019-3014966 & |
| January 1, 2020-December 31, 2025 | : | | R-2022-3037368 |

CERTIFICATE OF SERVICE

I hereby certify that I have, this 4th day of March, 2024, served a true and correct copy of the foregoing document 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 E-FILE & E-MAIL

Rosemary Chiavetta, Secretary (E-File)
Pennsylvania Public Utility Commission
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Date: March 4, 2024

/s/ Michael S. Swerling
Michael S. Swerling

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | |
|--|---|------------------------------|
| UGI Utilities, Inc.'s Universal | : | |
| Service and Energy Conservation Plan for | : | Docket Nos. M-2019-3014966 & |
| January 1, 2020-December 31, 2025 | : | R-2022-3037368 |

VERIFICATION

I, Daniel V. Adamo, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: March 4, 2024

/s/ Daniel V. Adamo
Daniel V. Adamo
Director Customer Service



UGI Utilities, Inc. – Gas Division
UGI Utilities, Inc. – Electric Division

**Universal Service & Energy Conservation Plan
For the Five-Year Period
January 1, 2020 – December 31, 2025**

Docket Nos. M-2017-2598190
M-2019-3014966

Filing Date: June 30, 2017
Revised: November 1, 2018
Revised: September 6, 2019
Revised: October 11, 2019
Revised: October 24, 2019
Revised: December 6, 2019
Revised: July 18, 2022
Revised: October 28, 2022
Revised: December 28, 2022
Revised: March 4, 2024

UGI 2020-2025 USECP

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UGI 2020-2025 USECP

I. INTRODUCTION

UGI Utilities, Inc. (“UGI”) hereby submits this revised Universal Service and Energy Conservation Plan (“USECP” or “Plan”) for the five-year period January 1, 2020 through December 31, 2025 to the Pennsylvania Public Utility Commission (“PUC” or “Commission”) for its review and approval in accordance with the Commission’s *Universal Service and Energy Conservation Reporting Requirements* at 52 Pa. Code §§ 54.71 – 54.78 and §§ 62.1 – 62.8.¹ The USECP replaces and supersedes the UGI Companies’ Universal Service and Energy Conservation Plan for the four-year period of January 1, 2014 through December 31, 2017 (the “2014-2017 USECP”) previously approved by the Commission at Docket No. M-2013-2371824 by orders entered January 15, 2015, June 11, 2015 and September 3, 2015. The USECP pertains to the universal service programs of UGI’s Electric Division (“UGI Electric”) and Gas Division (“UGI Gas”). This Plan incorporates the modifications required by the Commission’s Order entered August 8, 2019 (“August 8th Order”) and the Commission approval of the settlement in the UGI Gas base rate proceeding at Docket No. R-2018-3006814 (Order entered October 4, 2019) (“2019 Rate Case Order”). Additionally, this Plan incorporates, as well as, revises Customer Assistance Program enrollment and budget projections associated with revised CAP percent of income plan projections approved by Commission Order (entered on June 16, 2022) at Docket Nos. M-2019-3014966 and P-2020-3019196. Moreover, this Plan is being revised per the Company’s October 28, 2022 filing to revise the USECP for 2020-2025 in Docket No. M-2019-3014966 (“October 28th Filing”). The Plan incorporates modifications to the USECP required by the Commission’s Order entered September 15, 2022 (“September 15th Order”) and the Commission’s approval of the Settlement in the UGI Gas base rate proceeding at Docket No. R-2021-3030218 (“2022 Gas Rate Case Settlement”), which were filed on October 28, 2022. ~~Finally~~Further, the Plan incorporates two clarifications required by the Commission’s December 8, 2022 Secretarial Letter (i.e., when LIURP benefits will be available to customers at 151%-200% of the Federal Poverty Income Guidelines and what “Warm Referrals” are). Finally, the Plan incorporates modifications to the USECP pursuant to the Commission’s Order entered September 21, 2023, and the Commission’s approval of the Settlement in the UGI Electric base rate case proceeding at Docket Nos. R-2022-3037368, et al., which are being filed on March 4, 2024. (“March 4th Filing”).

This 2020-2025 USECP sets forth the rules, terms and conditions and funding levels under which UGI will administer its universal service and energy conservation programs and policies (“Universal Service Programs” or “USPs”) to eligible customers for the period of January 1, 2020 through December 31, 2025. **Appendix A** of the Plan sets forth the committed funding levels and budgets for each of the UGI divisions during this time period. **Appendix B** of the Plan sets forth the projected needs assessment as required by the Commission’s regulations at 52 Pa. Code

¹ By Order entered on October 3, 2019 at Docket No. M-2019-3012601 (“October 3rd Order”), the Pennsylvania Public Utility Commission granted temporary partial limited waivers of 52 Pa. Code §§ 54.74, 54.76 (a-b), 62.4, and 62.6 (a-b) to natural gas and electric distribution companies for the purpose of adhering to the 2020-2025 universal service and energy conservation plan and universal services impact evaluation filing schedule provided therein. The term of the UGI USECP is therefore 2020 through 2025.

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§ 62.4(b)(3).² **Appendices C & D** provide a list of third-party, community-based organizations (“CBOs”) to be utilized by UGI to assist in administering the Universal Service Programs. **Appendix E** sets forth UGI’s notification process to prompt customers to recertify for CAP. **Appendix F** provides the Zero Income form to be used for CAP. **Appendix G** provides the CAP Agency Audit Scorecard.

UGI Gas is a “public utility” and a “natural gas distribution company” (“NGDC”) as defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2202, and is subject to the regulatory jurisdiction of the Commission. UGI Gas provides natural gas distribution service and supplier of last resort (“SOLR”) service. UGI Gas combined serves approximately 585,000 residential customers in 46 counties.

UGI Electric is a “public utility” and an “electric distribution company,” as defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2803, and is subject to the regulatory jurisdiction of the Commission. UGI Electric provides electric distribution, transmission and default supply services to customers located in its certificated service territory. UGI Electric furnishes electric distribution service to approximately 54,000 residential customers located in portions of two northeastern Pennsylvania counties (Luzerne and Wyoming counties).

On October 1, 2018 UGI Penn Natural Gas, Inc. (“PNG”) and UGI Central Penn Gas, Inc. (“CPG”) merged into UGI Utilities, Inc. Data prior to October 1, 2018 may reference the UGI Distribution Companies and individually, the former PNG, CPG, and UGI Utilities, Inc. – Gas Division corporate entities then in existence. References to “UGI Gas” pre-October 1, 2018 refer to the UGI Utilities, Inc. – Gas Division operations.

II. 2020-2025 USECP OVERVIEW

A. SUMMARY OF THE 2020-2025 USECP

1. USECP Programs

To assist low-income and payment-troubled customers located in their service territories, UGI has established the USECP in accordance with the Commission’s regulations. UGI’s Universal Service Programs include the following:

- Customer Assistance and Referral Evaluation Services (“CARES” or the “CARES Program”);

² The needs assessment was calculated for the former UGI North and UGI South Rate Districts. The UGI Central Rate District was not required to conduct a projected needs assessment since it serves fewer than 100,000 residential accounts. See 52 Pa. Code § 62.7. Per the October 3rd Order these rate districts are no longer in existence. For the Company’s next USECP, the needs assessment for UGI Gas will be calculated on a combined basis. UGI Electric is not required to conduct a projected needs assessment since it serves fewer than 60,000 residential accounts. See 52 Pa. Code § 54.77.

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- Hardship Fund or the “Operation Share Energy Fund”;
- Customer Assistance Program (“CAP”); and
- Low Income Usage Reduction Program (“LIURP”).

UGI also actively encourages payment-troubled, low-income customers to apply for grants from the Low-Income Home Energy Assistance Program (“LIHEAP”).

2. Customers Served

In 2016, the UGI Distribution Companies assisted approximately 51,000 residential customers through their Universal Service Programs. The total number of participants by program for UGI Gas, UGI Electric, PNG and CPG in 2016 is set forth in Table 1: (CAP customer counts are as of 12/31/16).

| Table 1. Universal Service Customers Served in 2016 | | | | | | |
|--|---------------|--------------|-----------------------|--------------------------|----------------------|---------------|
| Number of Participants | CAP | LIURP | CARES* | | Hardship Fund | Total |
| | | | CARES referral | LIHEAP recipients | | |
| UGI Gas | 7,126 | 124 | 171 | 11,816 | 698 | 19,935 |
| PNG | 5,146 | 149 | 67 | 11,906 | 521 | 17,789 |
| CPG | 1,861 | 47 | 6 | 4,961 | 231 | 7,106 |
| UGI Electric | 2,322 | 16 | 16 | 2,734 | 167 | 5,255 |
| Total | 16,455 | 336 | 260 | 31,417 | 1,617 | 50,085 |

*CARES consists of number of CARES customer and # of LIHEAP (Cash and Crisis) recipients

A summary of the UGI Distribution Companies’ program expenditures for the Universal Service Programs in 2016 is found below:

| Table 2. 2016 Universal Service Program Expenditures | | | | | |
|---|--------------------|--------------------|------------------|----------------------|--------------------|
| Company | CAP | LIURP | CARES | Hardship Fund | Total |
| UGI Gas | \$2,470,473 | \$853,543 | \$68,108 | \$6,980 | \$3,399,105 |
| PNG | \$2,137,094 | \$881,288 | \$36,617 | \$5,210 | \$3,060,209 |
| CPG | \$735,806 | \$294,362 | \$17,040 | \$2,310 | \$1,049,518 |
| UGI Electric | \$1,848,644 | \$76,960 | \$16,797 | \$1,670 | \$1,944,071 |
| Total | \$7,192,018 | \$2,106,153 | \$138,562 | \$16,170 | \$9,452,903 |

3. Administration

UGI has dedicated employees who are trained and committed to ensuring eligible

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customers are referred to all appropriate Universal Service Programs (“USP Staff”) in order to provide the greatest benefits to customers. The USP staff is structured as follows:

- Senior Manager, Customer Programs³ (1 full-time): Responsible for strategy, supervision, and regulatory reporting.
- Senior Director, Customer Success & Community Relations⁴ (1 full-time): Responsible for compliance and call centers.
- Manager, Universal Services⁵ (1 full-time): Responsible for the day to day supervision of the group and all reporting requirements.
- Senior Customer Outreach Coordinator (1 full-time): Primarily responsible for training UGI staff and CBO caseworkers.
- Senior Customer Outreach Representative (2 full-time): Responsible for leadership support of Outreach team and the CBOs.
- Customer Outreach Representatives (6 full-time): Responsible for the day to day operations of LIURP, CAP, Operation Share Energy Fund, CARES and LIHEAP. Each maintains daily contact with the CBOs responsible for the administration of each program.
- LIHEAP Outreach Representatives (3 full-time)⁶: Responsible for the day to day operations of LIHEAP. Each maintains daily contact with CBOs responsible for the administration of LIHEAP.

UGI contracts with CBOs to assist the USP Staff in customer referrals and administration of the USPs. Together, the USP Staff and the CBOs have the capability to screen, enroll and refer customers for all available Universal Service Programs. The USP Staff incorporates all Universal Service Program referrals into existing processes (Cold Weather Interim Procedure (“CWIP”), collection, compliance and contract management). In addition to referrals to all Universal Service Program components, referrals are also made to LIHEAP and State Weatherization programs.

4. Communication

There are numerous means by which the USP Staff and its CBO partners provide residential customers with information on available programs and assist them in receiving

³ In October 2021, the Senior Manager Customer Programs position was created replacing the former Senior Manager, Credit Collections & Regulatory Compliance position.

⁴ In September 2021, the Director, Customer Service position was eliminated.

⁵ In March 2022, the Manager Universal Services position was created replacing the former Customer Outreach Senior Supervisor position.

⁶ In February 2020, UGI moved from four to three full-time LIHEAP Outreach Representatives.

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assistance from CBOs. Information about the USPs is delivered to customers via regular bill inserts and through the USP Staff upon customer inquiry. UGI has a dedicated toll-free telephone number, 1-800-UGI-WARM that customers can call to get program information. UGI also maintains a page on its website that provides information on universal service programs and eligibility: <https://www.ugi.com/customer-services/customerassistance/>.

As stated in more detail in the summary of plan changes, with this 2020-2025 USECP UGI is creating additional communication channels with their customers by permitting its customers to apply and/or recertify for CAP over the phone with provision of supportive documentation through mail, or additional means, as permitted by the CBOs. Additionally, in accordance with Paragraph 45 of the 2022 Gas Rate Case Settlement, the Company agreed to provide detailed information regarding its USP, targeted at UGI Gas customers who recently converted to natural gas, in its new customer welcome packet.⁷ Moreover, pursuant to Paragraph 60(a) - (c) of the 2023 Electric Rate Case Settlement, UGI Electric agreed to: (1) solicit Electric customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company's CAP two times a year until at least the effective date of the Company's next USECP; (2) accept verbal self-reported income eligibility for Electric customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other Electric customer contact with the call center for an unpaid bill; and (3) automatically enroll Electric LIHEAP recipients into CAP according to specific conditions.⁸

B. SUMMARY OF CHANGES TO PLAN

As required by Section 62.4 of the Commission's regulations, 52 Pa. Code § 62.4, this section of the Plan describes the modifications and enhancements made to UGI's Commission-approved 2014-2017 USECP. Set forth below is a description of the changes made to the individual Universal Service Programs. Certain changes that touch on more than one program include: (1) UGI's establishment of a Universal Service Advisory Committee ("USAC") to convene at least twice per calendar year to consist of interested stakeholders, including but not limited to the active parties at this docket, CBOs, and the Commission's Bureau of Consumer Services; and (2) revisions to enrollment and budget projections.

1. The CARES Program

UGI has modified its protection from abuse ("PFA") handling procedures to further ensure the confidentiality of PFA information consistent with the settlement of the UGI Gas base rate proceeding, at Docket Number R-2015-2518438 (Opinion and Order entered October 14, 2016 at ordering paragraph 53). Consistent with the Settlement, any customer who provides UGI with a copy of their PFA order is handled solely by the smaller number of CARES representatives for USP program referrals and payment options.

⁷ October 28th Filing.

⁸ See [March 4th Filing](#).

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2. Operation Share Energy Fund

UGI has made the following changes to the Operation Share Energy Fund:

- Permit the use of Hardship Funds through Operation Share for reconnection fees for income-qualified UGI customers or applicants, regardless of the customer or applicant's prior or current enrollment in CAP.
- Clarification that only the fee payable to CBOs for Hardship Fund-related services is recoverable through the USP Rider.
- In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, for UGI Gas customers, UGI is: (1) expanding eligibility for the Operation Share grant program to 250% FPL; (2) increasing the grant size from \$400 to \$600 to qualifying Gas customers (beginning November 2022); and (3) providing a one-time payment to the Operation Share in the amount of \$500,000 during the winter of 2022-2023.⁹
- In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, for UGI Electric customers, Effective January 1, 2024, the Company will expand eligibility of the Electric Operation Share grant program from 200% FPL to 250% FPL and will increase its annual funding contribution by \$30,000. This will bring UGI Electric's annual funding for Operation Share to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding. Effective January 1, 2024, the Company will also increase the maximum grant size from \$400 to \$600, to the extent funds are available.¹⁰

3. CAP

The 2020-2025 Plan includes the following changes to CAP:

- Customers are permitted to apply and/or recertify for CAP over the phone, with provision of supportive documentation of income eligibility through mail. CBOs are permitted to offer additional means of providing supportive documentation. Those CBOs which offer additional means of communication are indicated in Appendix C of the Plan. In-person appointments with a CBO will remain available to those customers who choose to apply in person.
- To improve customer solicitation for CAP, starting in year 2 of the 2020-2025 USECP, the Companies will provide CAP CBOs with low-income indicated

⁹ October 28th Filing.

¹⁰ [March 4th Filing.](#)

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customer lists for direct CAP solicitation. Customers will have the ability to opt-out from provision of their customer information to third parties by a general opt-out option on the customer information system portal.

- The CAP welcome letter for enrolled customers will include the CBO contact information.
- Updated eligibility criteria as follows: (1) permitting customers who operate a business from their residential home to enroll in CAP so long as the business that is being operated from the residential home uses less than fifty percent of the anticipated gas usage served through a single meter; (2) prohibition of CAP for customers using utility service to heat a swimming pool; (3) elimination of the CAP eligibility restriction for customers with balances above \$4,500 who have failed multiple payment arrangements; (4) specification of acceptable forms of identification; (5) clarification of “household income” definition; (6) clarification of terms “fraud” and “theft of service.”
- Clarifications to the CAP application policy and reinstatement policy.
- Introduction of quarterly evaluations of CAP bills.
- Inclusion of Audit Checklist to evaluate CAP CBO performance as Appendix G.
- Specification of new reporting requirement.
- Provision of hypothetical to demonstrate CAP offset calculation.
- UGI Electric has increased its minimum CAP payment from \$25 to \$30 to comport with the Commission’s Policy Statement on Customer Assistance Programs at 52 Pa. Code § 69.265(3)(i)(A)-(C).
- Updated the percent-of-income (“PIP”) calculation in accordance with the CAP Policy Statement Order.¹¹
- Pursuant to Paragraph 48(b) of the 2022 Gas Rate Case Settlement, UGI Gas agreed to continue its outreach to active Gas customers who have been removed from CAP

¹¹ Pursuant to Paragraph 47 of the 2022 Gas Rate Case Settlement, the Company agreed that it would fully comply with the Commission’s Order entered June 16, 2022 in Docket Nos. M-2019-3014966 and P-2020-3019196. To that end, on July 18, 2022, UGI filed its revised 2020-2025 USECP (July 18 Compliance Filing), which revised this USECP to fully comply with the Commission’s June 16, 2022 Order, including the updated PIP’s that appear in Section V.H.1 of this USECP. By Secretarial Letter dated July 25, 2022, the Commission determined that the July 18 Compliance Filing was compliant with the June 16, 2022 Order.

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due to failure to recertify. If these customers submit income documentation, they will be reenrolled, and any arrearage accrued will be included with their existing pre-program arrearages.¹²

- Pursuant to Paragraph 60 (a-b) of the 2023 Electric Base Rate Case Settlement, UGI Electric will:
 - Solicit customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company’s CAP 2 times a year until at least the effective date of the Company’s next USECP.
 - Accept verbal self-reported income eligibility for customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period.¹³

- Pursuant to Paragraph 60 (c-d) of the 2023 Electric Base Rate Case Settlement, UGI Electric will do the following:
 - At such time that the Pennsylvania Department of Human Services (“DHS”) notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, UGI Electric will implement required modifications to its IT system and processes, within a reasonable time frame, such that it may utilize that data to automatically enroll non-shopping LIHEAP recipients into CAP and/or recertify their income and eligibility. Until such time as IT system and process changes are made, the Company will use best efforts to implement manual processing (in the form of an interim pilot discussed below) as soon as practicable, not to exceed three (3) months from the date data is first received.
 - All automatically enrolled LIHEAP recipients will be deemed as being confirmed low income customers eligible for winter shutoff protections.
 - The interim pilot will involve UGI Electric auto-enrolling non-shopping customers who receive LIHEAP into CAP, pending implementation of the auto-enrollment process described in Paragraph 60(c) of the 2023 Electric Base Rate Case Settlement and will contain the following elements:
 - UGI Electric will auto-enroll non-shopping customers who received LIHEAP during the 2022/2023 LIHEAP season and will continue to enroll new LIHEAP recipients during each subsequent LIHEAP season until the time that DHS begins sharing LIHEAP

¹² October 28th Filing.

¹³ March 4th Filing.

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- income participant data with utilities (as described in Paragraph 60(c)).
 - Auto-enrolled customers will be placed on CAP under the average bill methodology, unless they provide the Company with proof of income documentation demonstrating qualification for the opportunity to be placed on the lesser of a percent of income (“PIP”) bill or minimum bill amount.
 - Auto-enrolled customers will receive a notification by mail or email as applicable from the Company explaining: (a) the reason for the auto-enrollment; (b) the ability to opt-out of the auto-enrollment; and (c) the opportunity to be placed on the lesser of the CAP minimum bill or PIP bill by providing proof of income.
 - Auto-enrolled customers will be required to recertify their CAP enrollment one year after they are auto-enrolled.
 - Auto-enrolled customers, who are enrolled through the interim pilot and for whom UGI Electric later receives detailed income information from DHS through the data-sharing process identified in Paragraph 60(c), will be transitioned to the best available CAP rate (i.e., PIP, average bill, or minimum bill).
 - Auto-enrolled CAP customers with arrearages less than \$300 at the time of auto-enrollment will be eligible to include their pre-program arrearage (“PPA”) debt forgiveness if they later reenroll in the program.
 - Auto-enrolled customers will be eligible for a one-time payment arrangement (after they leave or are otherwise removed from CAP) on arrears incurred while enrolled in CAP at the average bill rate.¹⁴
- Pursuant to Paragraph 60 (e)(i-v) of the 2023 Electric Base Rate Case Settlement, UGI Electric committed to convene a collaborative with interested stakeholders to identify:
 - The manner and method of outreach and education for auto-enrolled customers to verify income and inform them of program rights and responsibilities.
 - Data points that can be tracked to measure the effectiveness of the pilot program.
 - Associated pilot program action dates related to outreach, education, and auto-enrolment start.
 - During the interim pilot’s term, UGI Electric will provide updates during each USAC meeting regarding the data points identified and agreed upon in the collaborative to determine whether adjustments are needed.
 - The interim pilot will cease operation if and when the terms of Paragraph

¹⁴ March 4th Filing.

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60(c) take effect, regarding when DHS begins sharing LIHEAP participant income data with utilities.¹⁵

4. LIURP

The 2020-2025 Plan includes the following changes to the LIURP program:

- Non heating LIURP customers may be provided an Energy Conservation Kit.
- Updated eligibility criteria as follows: (1) permitting customers who operate a business from their residential home to enroll in LIURP so long as the business that is being operated from the residential home uses less than fifty percent of the anticipated gas usage served through a single meter; (2) prohibition of LIURP for customers using utility service to heat a swimming pool; (3) clarification of “above-average” usage.
- Pursuant to the September 15th Order and Paragraph 44(b) of the 2022 Gas Rate Case Settlement¹⁶, UGI Gas will expand the use of LIURP funds to address the repair or replacement of its residential customers’ inoperable gas furnaces. UGI Gas will increase its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary. Additionally, UGI Gas will set aside \$250,000 annually from its general LIURP budget for furnace repair and replacement projects. For the first two years of the USECP, any unused amounts will roll over to the next year’s budget for furnace repair and replacement projects. Should there continue to be amounts to roll over after two years, any remaining roll over amounts will roll over to UGI Gas’s general LIURP budget up until 2022. Thereafter, per Paragraph 44(a) the 2022 Gas Rate Case Settlement, UGI Gas will increase its general LIURP budget by \$250,000: (1) beginning January 1, 2023; and (2) beginning January 1, 2024. Effective January 1, 2024, the general LIURP budget shall remain unchanged until the Commission approves a change thereto. However, if more than 25% of the general LIURP budget remains unspent on or after January 1, 2025, or in each year thereafter, the Company will take reasonable efforts to spend the funds within the first 6 months of the next year. If, after reasonable efforts are undertaken to spend the unspent funds within the 6 month period, funds still remain, they will not roll forward.¹⁷
- The August 8th Order approved UGI’s petition for waiver of LIURP regulation payback requirement at 52 Pa. Code § 58.11(a) and the LIURP high-use criteria at

¹⁵ [March 4th Filing](#).

¹⁶ Prior to the September 15th Order, UGI Gas had a per-job LIURP funding cap of \$11,000 where furnace replacement was necessary.

¹⁷ October 28th Filing.

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52 Pa. Code § 58.10(a)(1). Paragraph 19 of the August 8th Order provided that these temporary waivers will expire in five years or with the Company's next USECP, whichever is earlier, unless an extension is expressly requested by the Company and granted by the Commission. (August 8th Order, p. 82) Subsequent to the August 8th Order, the Commission extended the term of this USECP to five (5) years. To maintain program continuity, the Company therefore requests that the Commission grant waiver of these regulations until the approval of UGI's next USECP.

- Per Paragraph 44(c) of the 2022 Gas Rate Case Settlement, UGI Gas will expand LIURP access to customers between 151% and 200% of the Federal Poverty Income Guidelines ("FPIG") to commence on January 1, 2023. UGI Gas will provide a Warm Referral¹⁸ for customers in this income tier who are rejected from UGI Gas's Customer Assistance Program ("CAP") for being over-income.¹⁹
- Per Paragraph 44(d) of the 2022 Gas Rate Case Settlement, no later than January 27, 2023, UGI Gas will lower its LIURP minimum usage threshold to 73.1 Ccf per month for customers at or below 200% FPIG.²⁰
- Per Paragraph 59(a) of the 2023 Electric Rate Case Settlement, within 60 days after the final order is entered in that proceeding, which occurred on September 21, 2023, UGI Electric agreed to issue a request for proposal ("RFP") for an additional LIURP resource, including CBOs in UGI Electric's service territory, capable of performing 20 additional baseload and 10 additional heating jobs annually.²¹
- Per Paragraph 59(b) of the 2023 Electric Rate Case Settlement, effective January 1, 2024, UGI Electric will lower its Electric LIURP heating and baseload job access to customers between 151% and 200% FPL; a limit of 20% of the overall LIURP budget shall apply for jobs related to customers falling between 151% and 200% FPL.²²

C. NEEDS ASSESSMENT

As required by 52 Pa. Code § 62.4(b)(3), at the time of initial filing, UGI South and UGI North rate districts submitted a needs assessment in Appendix B of this Plan. The needs assessment is based on 2010 census data and 2015 UGI Gas records. Pursuant to 52 Pa. Code §§

¹⁸ A Warm referral automatically refers these customers to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). The Company proactively determines if these customers qualify for benefits under these other programs without any need by the customer to apply for the benefits.

¹⁹ October 28th Filing.

²⁰ October 28th Filing.

²¹ Per the September 21, 2023 Order, [a]ll associated incremental costs shall be recoverable as expanded through Rider USP as LIURP costs.

²² March 4th Filing.

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54.77 and 62.7, EDCs and NGDCs with less than 100,000 residential customers are not required to submit a needs assessment; therefore, UGI Electric and the former UGI Central rate district did not submit a needs assessment. Future USECPs will provide needs assessments on a combined basis for UGI Gas

III. THE CARES PROGRAM

A. DESCRIPTION OF THE CARES PROGRAM

1. Goals and Objectives

The goal of the CARES Program is to provide personal assistance and referrals to payment-troubled customers and to help improve their delinquent bill payment problems. The CARES Program identifies special needs customers and guides them to the appropriate program or agency. CARES concentrates on, but is not exclusively for, the low-income segment that may lack the knowledge of energy conservation, budget counseling and fuel assistance programs. Unlike other USPs administered by UGI, the CARES Program is geared toward the customer who has a temporary, immediate need, such as loss of income, loss of head of household, illness or any other temporary situation resulting in an inability to pay. CARES is intended to be a short-term assistance referral program to guide a customer through a difficult time and to help inform and educate them about the available assistance. The CARES Program also provides extensive LIHEAP outreach to help increase awareness of the program and encourage all eligible households to apply for grants. Specifically, all customers who provide UGI with a copy of their PFA order are handled by CARES representatives for specific program referrals and payment options.

2. Program Design

The CARES Program was developed as an outreach and referral service to assist customers with special hardships. CARES is available to any residential customer who is confronted with a temporary hardship that could result in the loss of utility service. Assistance is obtained through UGI's programs and the established network of social agencies. CARES is designed to help a select group of customers with special circumstances, which may include, among other things, the need for help in paying their utility bill or assistance from a social agency. UGI offers information, guidance and referrals to obtain energy assistance and other social help programs from the Customer Outreach Department. Each CARES customer may receive an informational mailing. The mailing contains educational material on each of the assistance programs and any other referral information that may be helpful to the customer.

At appropriate times of the year, eligible CARES customers receive information on additional Customer Outreach programs, such as LIHEAP, LIURP, CAP, and the Operation Share Energy Fund.

B. FUNDING AND BUDGET

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See Appendix A for the UGI's budgets for the CARES program.

C. ELIGIBILITY CRITERIA

Any residential customer with a delinquent balance or a negative ability-to-pay and special circumstance may be eligible for CARES. For example, recent unemployment, disability, loss of head of household, inability to understand their bill, temporary illness or need for senior citizen assistance, would render a customer eligible for CARES.

D. INTAKE / NETWORKING

Customer Outreach employees maintain contact with CBOs through referrals and educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers in energy conservation and to increase public awareness of the various CARES Program services. Presentations are made throughout the service territory and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues.

IV. THE OPERATION SHARE ENERGY FUND

A. PURPOSE & OBJECTIVES

A number of causes, foreseen and unforeseen, could potentially affect the ability of customers to pay their bills. UGI's hardship fund – Operation Share Energy Fund – has been formed for the purpose of providing assistance to residential customers faced with a hardship in paying their energy bill due to an unforeseen situation. To achieve its purpose, the Operation Share Energy Fund includes the following objectives:

- to provide customers, employees and the public an opportunity to contribute money to help their less fortunate neighbors who are unable to pay their energy bills due to unforeseen circumstances;
- to give financial assistance to current customers that have fixed or low incomes, are unemployed, disabled or faced with some catastrophic event or crisis situation;
- to provide additional funds and support to community organizations that are dedicated to this same purpose.

For the 2020-2025 USECP, UGI will be permitted to use hardship funds to pay for reconnection fees for customers or applicants who are income qualified for the program, regardless of the customer or applicant's prior or current enrollment in CAP.

B. FUNDING AND BUDGET

Operation Share funding will be used to make voucher payments directly to residential

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customers declared eligible by the designated administering agency, less amounts used for administrative expenses. UGI matches the total contributions made by customers, employees or outside sources to Operation Share each year. No matching funds are made available to match public, tax-supported sources, such as LIHEAP, however. Employees of UGI are encouraged to make a donation directly to Operation Share. Additional fundraising events may be organized in each of UGI's service territories. It is intended that an appeal will be made at least twice during the year to all of UGI's customers, via a billing insert, to make a contribution to Operation Share. The insert describes Operation Share and requests support with a check for any amount.

See **Appendix A** for UGI's funding for the hardship fund.

C. ADMINISTRATION

The Operation Share program is administered by UGI's USP Staff using the Customer Outreach System ("COS"). The COS provides customer information, such as eligibility criteria, account balance, recent bills and payments. UGI contracts with CBOs that have the ability to process grants using web-based applications, which then use the account information from the COS to determine the amount of grant awarded to the customer. The COS also maintains the financial aspects of the program.

A specific role is established in the COS for the representative that has the final authority to approve or deny assistance for a customer. This designated person is responsible for the Operation funds assigned to a CBO. UGI's personnel will not participate in the determination of grants, other than to refer applicants to the CBO for consideration.²³

Operation Share Energy Fund is designated as a public charity under section 501(c)(3) of the Internal Revenue Code. All donations from customers, employees, and outside sources are kept in a separate Operation Share bank account and passed directly to the participating agencies to permit them to make direct payments to energy vendors for those applicants who qualify.

D. ELIGIBILITY

The guidelines for grants from Operation Share allow for administrative flexibility in providing assistance. In order to assure fair treatment of all applicants, however, the following guidelines must be followed (unless UGI or the CBOs agree to waive or modify a guideline in extraordinary circumstances):

- the customer must have a residential account with UGI and the customer's premise is the customer's primary residence;
- the customer must have an active heating or non-heating utility account;

²³ There are some occasions where personnel will approve Operation Share on a customer's behalf, for example, in the instance of a legislative request to supplement LIHEAP grants.

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- the customer must not have received an Operation Share grant in the last 12 months;
- the customer must have an outstanding balance on their utility bill;
- the maximum income of the a gas customer's household must be at or below the current federal poverty income guidelines ("FPIG") of 2500%;²⁴
- pursuant to Paragraph 58 of the 2023 Electric Rate Case Settlement, effective January 1, 2024, the Company will expand eligibility of the Electric Operation Share grant program from 200% FPIG to 250% FPIG;²⁵
- the customer must provide adequate information to demonstrate inability to pay energy bills;²⁶
- customers for Operation Share with delinquent balances must first contact the Credit Department to discuss their options; and
- an active participant in the CAP is not eligible for Operation Share assistance.

Residential accounts with the following indicators are not eligible for this program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- theft of service; and
- Landlord if Shut-off ("LIFSO") agreement (account is in the owner's name).

In order to assure fair treatment of all customers, the following amounts represent the maximum grant to be awarded per eligible customer in each of UGI's divisions and rate districts.

| Division | Maximum Amount |
|-----------------|-----------------------|
| UGI Gas | \$600 ²⁷ |
| UGI Electric | \$4600 ²⁸ |

²⁴ [October 28th Filing.](#)

²⁵ [March 4th Filing.](#)

²⁶ Necessary information includes evidence of income of all members of the household. In addition, the applicant will authorize the CBO (verbally or written) to obtain account history information from their energy vendor. There is no requirement that each household member must verify household expenses as part of the Operation Share application process.

²⁷ In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, UGI Gas increased the grant size from \$400 to \$600 to qualifying Gas customers.

²⁸ [In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, UGI Electric increased the grant size from \\$400 to \\$600 to qualifying Electric customers.](#)

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Exceptions to the maximum grant amount may be approved for special circumstance customers.

E. PAYMENT OF GRANTS

The designated CBO is granted a maximum amount against which vouchers can be written. So long as the CBO's maximum amount is not exceeded, a voucher may be written and will be honored by UGI for the payment of the applicant's bill.

All cash funds must be retained by the CBO in its Operation Share account and payments from this account shall only be made to UGI. Under no circumstances will any payments be made directly to a customer. In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, UGI Gas is providing a one-time payment to the Operation Share in the amount of \$500,000 during the winter of 2022-2023. In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, on January 1, 2024, UGI Electric increased its annual Operation Share funding in the amount of \$30,000, bringing the annual funding to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding.²⁹

V. CUSTOMER ASSISTANCE PROGRAM

A. INTRODUCTION

CAP provides all eligible low-income, payment-troubled residential customers that reside in the rate districts of UGI a more affordable way to pay their natural gas or electric bill. Each month, CAP participants are billed an equal CAP payment amount based on the participant's gross income or average bill,³⁰ depending on which option provides the most affordable monthly CAP payment.

In this 2020-2025 USECP, UGI will continue the practice instituted in the previous 2014-2017 USECP to place no limit on CAP enrollment or set a maximum CAP credit per customer.

B. INTAKE/NETWORKING/EDUCATION

Customer Outreach employees maintain contact with CBOs through referrals and educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers of the benefits of CAP. Presentations are made throughout the service territory and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues. UGI will work

²⁹ [March 4th Filing](#).

³⁰ A customer's average bill will be determined based upon twelve-months of historical usage for the residence or, if usage data is not available for the residence, the customer's average bill will be set using the average bill for all residential customers.

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with its USAC to explore opportunities to provide consistent consumer education to CAP customers during their participation in CAP.

C. FUNDING AND BUDGET

See Appendix A for a more detailed description of CAP funding.

D. ADMINISTERING AGENCIES

CAP is administered by a variety of CBOs, listed in Appendix C of this Plan (the “CAP CBOs”) that are overseen by UGI’s Manager, Universal Services.³¹

With the help of the COS, the CAP CBOs are responsible for taking the following steps to enroll customers in the CAP³²:

- verify the application is complete and consent has been obtained;
- properly complete the CAP enrollment;³³
- verify eligibility, proof of identification, proof of income and family size;
- assist applicant to properly complete LIHEAP and other grant applications;
- fully explain the program benefits and responsibilities to the customer;
- discuss the payment amount, based on guidelines provided by UGI; and
- inform applicants in writing of missing information along with steps the applicant can follow to provide that information.
- confirm customer’s acceptance in the program.
- inform applicants in writing if CAP application is denied along with steps the applicant can follow to contest denial.

The CAP CBOs will provide customer education in the areas of:

- usage reduction education consistent with that outlined in LIURP below;
- low cost/no cost energy conservation tips;
- basic household budget counseling; and
- related items specific to the individual applicant’s needs, including providing an energy

³¹ Prior to March 2022, the former Customer Outreach Senior Supervisor position oversaw the CAP CBOs.

³² UGI’s USP Staff also enroll eligible customers into the CAP program.

³³ The CAP enrollment process will include application completion via telephone or mail when an in person visit is not required or feasible.

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education session for customers who historically have an above average usage.³⁴

The CAP CBOs are responsible for: (1) referring participants to any other assistance, social, or governmental programs that may provide help for any other present needs; (2) monitoring each account monthly based on UGI's prompted tasks on the COS, such as past due phone calls and recertification; and (3) providing energy education sessions to above average usage customers (i.e. customers exceeding the CAP usage criteria in Table 4).

Finally, while the CAP Administering Agencies will be responsible for processing the annual recertification of all requirements, UGI itself will process appeals for reconsideration from participants removed from CAP within 30 days.

Two changes in this 2020-2025 USECP, previously mentioned, are (1) the allowance of alternate means of communication for CAP enrollment and recertification; and (2) the expanded ability of CAP CBOs to directly solicit low-income indicated customers of the UGI Companies.

Alternative Means of Communication for CAP Enrollment and Recertification

UGI will allow customers and applicants for service to apply and/or recertify for CAP over the phone, with provision of supportive documentation through mail or other means (including but not limited to fax, email, or text messaging) that are reasonably available to the Company's CBO serving that portion of UGI's service territory. Once the CBO has verified that all of the documentation is received and accurate, the Company will send a Welcome Letter to the applicant, which will: (1) confirm that the applicant has been approved for CAP-; (2) provide the applicable CBO contact information; and (3) explain that at any time the customer may unenroll from CAP. In-person appointments with a CBO will remain available to those individuals who choose to apply in person. The available means of communication for each CBO is indicated on **Appendix C**.

Direct Solicitation

In year 2 of this USECP, UGI will provide CBOs with low-income customer lists for direct CAP solicitation.³⁵ To maintain customer privacy and respect customer preference, customers will have an option to opt-out from provision of their information to third-parties by a general opt-out option on the Customer Information System ("CIS") and through information on bill inserts.

Pursuant to Paragraph 60(a) of the 2023 Electric Rate Case Settlement, UGI Electric will solicit customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company's CAP 2 times a year until at least the effective date of the Company's next Universal Service and Energy Conservation Plan ("USECP").³⁶ Beginning in 2024, the solicitations will

³⁴ The UGI Companies will monitor CAP customer usage and implement controls to avoid excessive CAP customer usage.

³⁵ UGI will implement the direct solicitation of CAP customers by CBOs in year 2 of the USECP to ensure that any programming required for this programmatic change is completed prior.

³⁶ [March 4th Filing](#).

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occur in spring (May-June) and winter (November).

E. MONITORING

UGI will provide routine information and metrics to the CAP CBO pertaining to the performance of the administration of the program. In addition, UGI will make routine visits to the agencies and will also conduct annual training updates for CAP caseworkers. Further, UGI will audit agency performance by reviewing enrollments, re-certifications, and completed tasks. The audit will include confirmation that the appropriate paperwork is signed and when required, income verification and customer identification were obtained. The COS will maintain specific agency statistics such as: number of program participants; percentage of CAP customers that are past due; and an active list of customers that require re-certification. UGI's audit checklist is outlined in **Appendix G**.

F. EVALUATION

As required by the Commission's regulations, 52 Pa. Code § 62.6, both a program process evaluation and impact evaluation were performed in 2012 by an independent, third party evaluator (APPRISE), which provided a report of findings addressing the following areas:

- program design;
- administrative costs;
- program costs;
- payment behavior;
- consumption habits; and
- energy assistance participation.

UGI considered the recommendations of the APPRISE report in reviewing and preparing this 2020-2025 USECP. By Order entered on October 3, 2019 at Docket No. M-2019-3012601, the Commission granted temporary partial limited waivers of 52 Pa. Code §§ 54.74, 54.76 (a-b), 62.4, and 62.6 (a-b) to natural gas and electric distribution companies for the purposes of adhering to the 2020-2025 universal service and energy conservation plan and universal services impact evaluation filing schedule provided therein. UGI's next USECP evaluation report will be filed with the Commission by April 1, 2024 as provided in the October 3rd Order.

G. CUSTOMER ELIGIBILITY REQUIREMENTS

To be eligible for CAP, customers may be referred by UGI or CAP CBOs. To be eligible, a customer must: (1) complete the CAP application and have gross household income verified at 150 percent of poverty or less;³⁷ (2) be a residential heating or non-heating customer with active energy service from UGI; and (3) if a previous participant, a review will be completed to assure the reason for the prior default has been cured or the customer has been out of the program for a

³⁷ A customer with no income will be eligible to participate in CAP and be responsible to make the minimum monthly CAP payment.

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minimum of 12 months for a voluntary removal. Pursuant to Paragraph 44(c) of the 2022 Gas Rate Case Settlement, and beginning on January 1, 2023, Gas customers between 151% and 200% FPIG, who are rejected from CAP as being over-income, will receive a Warm referral. A Warm referral automatically refers these customers to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). The Company proactively determines if these customers qualify for benefits under these other programs without any need for the customer to apply for benefits. Benefits to qualifying customers include weatherization measures at residences and/or energy assistance grants for heating bills.

Pursuant to Paragraph 60 (c-d) of the 2023 Electric Base Rate Case Settlement, UGI Electric will do the following:

(c) At such time that the Pennsylvania DHS notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, UGI Electric will implement required modifications to its IT system and processes, within a reasonable time frame, such that it may utilize that data to automatically enroll non-shopping LIHEAP recipients into CAP and/or recertify their income and eligibility. Until such time as IT system and process changes are made, the Company will use best efforts to implement manual processing (in the form of an interim pilot discussed below) as soon as practicable, not to exceed three (3) months from the date data is first received. All automatically enrolled LIHEAP recipients will be deemed as being confirmed low income customers eligible for winter shutoff protections.³⁸

(d) The interim pilot will involve UGI Electric auto-enrolling non-shopping customers who receive LIHEAP into CAP, pending implementation of the auto-enrollment process described in Paragraph 60(c) of the 2023 Electric Base Rate Case Settlement and will contain the following elements:

- i. UGI Electric will auto-enroll non-shopping customers who received LIHEAP during the 2022/2023 LIHEAP season and will continue to enroll new LIHEAP recipients during each subsequent LIHEAP season until the time that DHS begins sharing LIHEAP income participant data with utilities (as described in Paragraph 60(c)).
- ii. Auto-enrolled customers will be placed on CAP under the average bill methodology, unless they provide the Company with proof of income documentation demonstrating qualification for the opportunity to be placed on the lesser of a percent of income (“PIP”) bill or minimum bill amount.
- iii. Auto-enrolled customers will receive a notification by mail or email as applicable from the Company explaining: (a) the reason for the auto-enrollment; (b) the ability to opt-out of the auto-enrollment; and (c) the opportunity to be placed on the lesser of the CAP minimum bill or PIP bill by providing proof of

³⁸ March 4th Filing.

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income.

- iv. Auto-enrolled customers will be required to recertify their CAP enrollment one year after they are auto-enrolled.
- v. Auto-enrolled customers, who are enrolled through the interim pilot and for whom UGI Electric later receives detailed income information from DHS through the data-sharing process identified in Paragraph 60(c), will be transitioned to the best available CAP rate (i.e., PIP, average bill, or minimum bill).
- vi. Auto-enrolled CAP customers with arrearages less than \$300 at the time of auto-enrollment will be eligible to include their pre- program arrearage (“PPA”) debt forgiveness if they later reenroll in the program.
- vii. Auto-enrolled customers will be eligible for a one-time payment arrangement (after they leave or are otherwise removed from CAP) on arrears incurred while enrolled in CAP at the average bill rate.³⁹

(e) Pursuant to Paragraph 60 (e)(i-v) of the 2023 Electric Base Rate Case Settlement, UGI Electric committed to convene a collaborative⁴⁰ with interested stakeholders to identify:

- i. The manner and method of outreach and education for auto-enrolled customers to verify income and inform them of program rights and responsibilities.
- ii. Data points that can be tracked to measure the effectiveness of the pilot program.
- iii. Associated pilot program action dates related to outreach, education, and auto-enrollment start.
- iv. During the interim pilot’s term, UGI Electric will provide updates during each USAC meeting regarding the data points identified and agreed upon in the collaborative to determine whether adjustments are needed.
- v. The interim pilot will cease operation if and when the terms of Paragraph 60(c) take effect, regarding when DHS begins sharing LIHEAP participant income data with utilities.⁴¹

An applicant’s Social Security Number (SSN) is requested in the CAP application as a form of customer identification but is not required for enrollment into the program. UGI will accept Individual Tax Identification Numbers (“ITIN”) in lieu of the applicant’s SSN. For those applicants who do not provide either an SSN or ITIN, UGI will waive this requirement provided that the customer provides two other acceptable forms of identification. Acceptable forms are:

1. One government issued photo identification such as:

³⁹ March 4th Filing

⁴⁰ UGI Electric convened the stakeholder collaborative on October 18, 2023.

⁴¹ March 4th Filing.

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- Driver's License
 - Passport
 - Military ID card
 - ID cards issued by Federal State or Local Government or;
 - Any valid foreign government ID
2. Two alternative forms of identification if a government issued photo identification is not available, such as:
- College student ID card
 - Social security card
 - Voter registration card
 - Birth Certificate
 - U.S. Citizen ID card/ Permanent Resident Card
 - Native American Tribal Card
 - ITIN (individual Taxpayer Identification Number)

All forms of identification must be valid and not expired.

Residential accounts with the following indicators are ineligible for CAP or will be removed from CAP:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- theft of service;
- LIFSO agreement (account is in the owner's name);
- choice customers;
- utility service used to operate a swimming pool;
- a residential property where more than fifty percent of the anticipated usage served through a single meter is used to operate a business.

UGI further reserves the right to deny enrollment if the customer is deemed to lack good faith, honesty or fair dealing while working with the CAP CBO or UGI during the application process or if the customer fails to engage in good faith efforts to conserve energy. Demonstration of lack of good faith honesty and fair dealing may be evidenced by fraud or theft of service. The Company defines "fraud" as the intentional misrepresentation of CAP eligibility criteria. "Theft

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of Service” occurs when a person obtains utility service by deception, tampering with Company facilities, or other means designed to avoid payment for utility service provided by the Company. The two most common examples of theft of service are: (1) a customer’s physical bypass of a meter so that all energy usage is not recorded; and (2) the magnetic tampering of a meter to impede the registration of usage. However, this list is not conclusive and other instances of theft may arise that results in a customer’s disqualification from CAP.

Upon request, subject to the recertification process, a CAP participant must provide evidence of continued program eligibility, which he/she may do so via the communication means indicated on **Appendix C**.

If a CAP participant changes residences, the following conditions will apply and be communicated to the customer: (1) as long as all eligibility requirements and other terms and conditions continue to be met, the participant may remain eligible to participate in CAP; and (2) so long as the participant remains enrolled in the program, no late payment charges will be imposed.

An applicant determined ineligible would receive written notification specifying the reason(s) for ineligibility. If the applicant is not satisfied with the determination of eligibility, the Company will use utility company dispute procedures in accordance with Chapter 56.151 and 56.152. The applicant may also appeal the denial of eligibility to the Bureau of Consumer Services in accordance with 52 Pa. Code §§ 56.162-56.166, relating to informal complaint procedures and may pursue a formal complaint against the Company. Notice of right to appeal will be provided with the written notification of ineligibility.

H. MONTHLY CAP PAYMENT AMOUNT

1. Determination of Monthly CAP Payment Amount

The amount to be paid by a CAP customer each month will be based on the lower of the percentage of the customer's monthly income, as described below, or the customer’s otherwise applicable average monthly bill.⁴² To determine the customer’s monthly CAP payment amount based on the percentage of the customer’s income, the customer’s monthly income is compared to the FPIG, and the payment amount is set based on the following guidelines:

Electric and Natural Gas Non-Heating Customers⁴³

| Household Income as Percent of FPIG | Monthly CAP Payment |
|--|------------------------------------|
| 0-50% | 2% of Participant’s Monthly Income |

⁴² Exceptions to the payment schedule and grant application practice will be made based on individual needs.

⁴³ The original footnote 12 was deleted when the Monthly CAP payments were updated on July 18, 2022.

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| | |
|----------|------------------------------------|
| 51-100% | 4% of Participant's Monthly Income |
| 101-150% | 4% of Participant's Monthly Income |

Natural Gas Heating Customers⁴⁴

| Household Income as Percent of FPIG | Monthly CAP Payment |
|-------------------------------------|------------------------------------|
| 0-50% | 4% of Participant's Monthly Income |
| 51-100% | 6% of Participant's Monthly Income |
| 101-150% | 6% of Participant's Monthly Income |

Electric Heating Customers

| Household Income as Percent of FPIG | Monthly CAP Payment |
|-------------------------------------|------------------------------------|
| 0-50% | 6% of Participant's Monthly Income |
| 51-100% | 8% of Participant's Monthly Income |
| 101-150% | 9% of Participant's Monthly Income |

Both gas and electric customers with no income will be responsible to make the minimum monthly CAP Payment.

If a customer's monthly CAP payment amount as a percentage of the customer's monthly income, as calculated above, exceeds the customer's otherwise applicable average bill amount, the customer's average bill will be set as the customer's monthly CAP payment amount.

At any time during the program should a participant's monthly income change, the monthly CAP payment amount will also be reviewed and changed, where appropriate. It is the customer's obligation to notify the company or the CAP Administering Agency of the change in income. UGI reserves the right to require that the customer provide proof of the change in income. A recertification will be processed using the updated income and historical usage to determine the new monthly CAP payment amount.

Additionally, the participant's monthly CAP bill will be reevaluated quarterly, to ensure that the participant is actively on the most affordable billing option. For example, if the customer entered into CAP with a percent-of-income plan, and upon a quarterly review, the customer's average bill is deemed to be the most affordable at the time of the review, the customer's new CAP will be based on their average bill until the next review.

UGI's minimum monthly CAP payment is within the suggested range set forth in the

⁴⁴ The original footnote 13 was deleted when the Monthly CAP payments were updated on July 18, 2022.

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Commission's Policy Statement on Customer Assistance Programs at 52 Pa. Code § 69.265(3)(i)(A)-(C). The CAP payment for gas heating accounts is set at \$25, non-heating accounts at \$15, and electric heating accounts at \$30.

2. Household Income Documents

To determine CAP eligibility and the appropriate CAP monthly payment, proof of income at or below 150% of FPIG must be provided by the customer to the Company. However, for customers receiving LIHEAP, who have already been determined to have income under 150% of the FPIG by DHS, the Company will accept self-certification of income level for the purpose of calculating the customer's monthly payment and no documentation of income is required for such customers. Moreover, pursuant to Paragraph 60(b) of the 2023 Electric Rate Case Settlement, on December 1, 2023, UGI Electric began accepting verbal self-reported income eligibility for Electric customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period.⁴⁵

Acceptable income documents are:

- Recent paystubs or W-2 forms
- Verified copy of rent receipts for rental income
- Benefit letter or copy of bank statement for;
 - Social security
 - Pension
 - Disability
 - SSI
- Verification Letter
 - alimony support
- Unemployment determination letter
- Notarized letter stating income
- Zero income form

Additional Notes:

- Interest does not need to be counted as income.
- UGI does not include income earned from an occupant under the age of 18, nor does it include income received for the benefit of a minor, in its calculation of household income.

⁴⁵ [March 4th Filing.](#)

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3. Use of LIHEAP Grants

LIHEAP grants received will be applied consistent with the Commonwealth of Pennsylvania's Low-Income Home Energy Assistance Program – Final State Plan (“Final State Plan”), and any subsequent amendments or changes thereto.

4. Late Fees & Security Deposits

While actively participating in the program, late payment charges will not be imposed on CAP customers. Security deposits are also not imposed on CAP customers.

I. PARTICIPANT OBLIGATIONS

In order to remain eligible for participation in CAP, a customer must agree to (in writing) and perform the following obligations:

- make the monthly CAP payments;
- apply for and direct to UGI the customer's LIHEAP Cash or Crisis grant;
- conserve energy and, if eligible, participate in LIURP and any other weatherization services offered through local and state weatherization agencies (unless residence was previously weatherized under these programs);
- provide access to the meter for an actual meter reading, if required;⁴⁶
- participate in good faith and comply with all educational, assistance, social or governmental programs recommended by the Company or by the CBO;
- report immediately to the CBO any change in family size, or change in income;
- comply with the recertification requirements; and
- apply for any assistance grant for which he/she may be eligible.

In order to assure fair treatment of all participants, however, UGI will administer the aforementioned obligations with sufficient flexibility to provide the assistance intended by the program. Therefore, UGI or CAP CBOs may agree to waive or modify one or more of the participant obligations in extraordinary circumstances.

⁴⁶ CAP Credit and Pre-Program Arrearage forgiveness may be held up if an actual meter reading is not available.

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J. PRE-PROGRAM ARREARAGE FORGIVENESS

UGI forgives a CAP customer's pre-program arrearage balance on a one thirty-sixth (1/36th) basis upon receipt of each timely and in-full CAP monthly payment. This practice provides immediate incentive for a CAP customer to continue the positive payment behavior. UGI also provides no less than a \$10.00 per month pre-program arrearage forgiveness. UGI applies arrearage forgiveness for each timely and in-full monthly payment, regardless of arrears, and retroactively for any months missed once those months are paid. For example, if a CAP customer is delinquent for three months of payments, and makes catch-up payments for two of those three months, the customer will receive forgiveness for those two months.

To be eligible for pre-program arrearage forgiveness, participants must maintain all program requirements in each month since enrolling in the program.

K. APPLICATION OF CAP CREDITS

Pursuant the Commission's regulations, at 52 Pa. Code § 62.2, and UGI's effective tariffs, a CAP credit is set as the difference between the CAP customer's actual usage bill calculated at the standard residential rate and the CAP monthly bill. UGI applies CAP credits on a monthly basis with each full CAP payment received. Any CAP credits associated with missed CAP payments will be applied once the customer brings their payments up to date.

UGI eliminated its per-customer maximum CAP credit in its 2014-2017 USECP. UGI's 2020-2025 USECP will likewise not have a per-person CAP credit maximum.

UGI institutes the following CAP control features to encourage energy conservation:

High Annual Usage at Enrollment: UGI uses the following thresholds to determine when a customer is considered to be a high usage customer. These thresholds were determined by analyzing the current population of customers and their usage information and determining a 95% confidence level.

| Division | High Usage |
|-----------------|-------------------|
| UGI Gas | 2,356 ccf |
| UGI Electric | 34,465 kwh |

Any customer that applies for CAP, and any existing CAP customer with usage above these assigned thresholds, will:

- Participate in an interview with the CAP caseworker. The CAP caseworker will review data specific to the customer's residence to determine potential reasons for the customer's high usage.
- The CAP caseworker will then conduct an energy education session.

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- If applicable, referrals will be made for the LIURP program.
- If enrolled, high usage will continue to be monitored for additional outreach and referrals.

This high-usage evaluation will take place annually for existing CAP customers.

Removal from CAP

1. A CAP customer may be removed from CAP for refusing to participate in the LIURP program.
2. A customer may be removed for failure to comply with these high usage controls.⁴⁷

L. RECERTIFICATION POLICY

1. CAP Recertification Requirements for LIHEAP and Non-LIHEAP Participants

Participants must provide evidence of continued program eligibility. The recertification process is a mandatory requirement in order to ensure proper participation and continued program eligibility.

UGI has a triennial recertification requirement for known LIHEAP participants. CAP customers who are not known LIHEAP participants are required to recertify for CAP annually. A customer will not be deemed ineligible for CAP on the basis of failure to participate in LIHEAP. Non-LIHEAP CAP customers who recertify annually for CAP will remain enrolled in CAP. To recertify, participants must provide:

- For LIHEAP Participants - When the LIHEAP income guidelines are the same as CAP; LIHEAP participants who have received a LIHEAP Cash or Crisis grant within the last 12 months will only be required to provide income documentation every three years to UGI.⁴⁸
- For Non-LIHEAP Participants - Income documentation must be provided annually to verify that the participant's household income is at or below the current 150% of the FPIG.

Should the participant fail or refuse to recertify within two billing cycles of being notified to do so, UGI may remove the customer from CAP. UGI believes this practice encourages those participants who continue to have household incomes at or below 150% to complete the

⁴⁷ Exceptions may be granted where the factors giving rise to the customer's increased consumption are beyond the customer's reasonable control.

⁴⁸ Historically the income criteria for CAP has matched that for LIHEAP. Should the LIHEAP and CAP income requirements differ, UGI will notify the LIHEAP-participating CAP customer of the responsibility to recertify on an annual basis.

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recertification process and, therefore, maintain affordable energy bills. The customer is responsible to reenroll in the program.

2. Recertification Reminder Schedule

The Companies actively remind CAP participants of their obligation to recertify income eligibility as per the following schedule:⁴⁹

- A recertification notice letter is mailed a month prior to the anniversary date (recertification due date);
- A contact from the CBO is made 15 days prior to the anniversary date;
- A reminder letter is mailed from the Company on the anniversary or on the recertification due date; and
- A contact from the CBO is made 1 month past the anniversary date.

3. Use of Zero Income Statements for CAP Enrollment and Recertification

UGI customers who report zero household income at the time of CAP enrollment and recertification are required to complete a “Zero Income Form,” as set forth in Appendix F. The Zero Income Form need not be notarized. The Zero Income Form must be filled out by the individual who holds the account with UGI. The following information is required: (1) customer name; (2) date of application; (3) account number; (4) service address; (5) a list of adult household members with zero income; and (6) an explanation of how household expenses were met for food and shelter during the applicable period. The Zero Income Form must be signed by both the account holder and a CAP CBO representative. As stated on the form, by signing the Zero Income Form, the customer provides consent to UGI to verify income with government agencies. UGI CBOs have reported that use of the form does not hinder participation in the UGI universal service programs and therefore UGI will continue to use the Zero income form without modification.

As outlined in the participant obligations customers are to immediately report a change in household size or income. Specifically, for a customer who reports zero income, UGI will require the customer update their income (if they have not already done so) six months following the report of zero income.

4. Impact of Recertification

Appropriate changes in the percentage of income and/or average bill payment will be made upon completion of the recertification process. If income or average bill payment at the time of recertification dictates a change in the monthly payment, the new amount will be used for future monthly payments. Future bills issued upon completion of recertification will reflect an appropriate CAP bill amount but past CAP bills issued are the customer’s responsibility to pay.

⁴⁹ See Appendix E for a schematic of the Companies’ recertification process.

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During the recertification process, if a participant is deemed ineligible for continued participation in CAP, the customer will be notified that they are no longer eligible to participate and the reason(s) why they are no longer eligible for CAP.

M. REASONS FOR REMOVAL FROM CAP

- Failure to make CAP payments that results in termination and the customer has not cured his/her payments within 109 days of termination.
- failure to comply with any customer obligation set forth in the program;
- failure to comply with the obligation of good faith, honesty and fair dealing while working with the CAP CBO or UGI;
- household income increases to greater than 150% poverty;
- failure to comply with established high usage controls;⁵⁰
- refusal to participate in LIURP;
- any reason for which the customer's service may be terminated under Chapter 56 or Chapter 14;
- failure/refusal to recertify in CAP;
- bankruptcy - at the time of the filing of bankruptcy all receivable amounts which may include frozen pre-program arrearage will fall under the jurisdiction of the bankruptcy court and will no longer be eligible for CAP benefits; and
- legal action - should UGI have reason to take legal action against a participant that encompasses any receivable owed it, all receivable amounts which may include pre-program arrearages will fall under the jurisdiction of the applicable court and will no longer be eligible for CAP benefits. Participants removed from the CAP will receive a written statement indicating the reason(s) for the dismissal. Customers defaulting and dropped from the CAP will be referred to the Company's Credit and Collection Department for further action, if necessary.

Any CAP participant may voluntarily request to be removed from the program. However, if a CAP participant requests to be removed from CAP for the reason that their seasonal usage bills total less than the monthly CAP amount (“seasonal short-term benefit”), the customer will be removed from the program and will forfeit all program benefits. The customer will then be required to remain out of CAP for a period of twelve months before they can re-apply for the program, provided exceptions will be granted on a case-by-case basis based on demonstrated hardship. The customer will be mailed a letter to confirm his request to be voluntarily removed

⁵⁰ Exceptions may be granted where the factors giving rise to the customer’s increased consumption are beyond the customer’s reasonable control.

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from CAP. UGI will accept the request for removal via phone with a UGI representative.

UGI removes customers when service is voluntarily discontinued by the customer and the CAP participant is no longer a customer. All unpaid bills and unforgiven dollars are due upon the removal from CAP as this is considered a broken payment arrangement.

UGI also reserves the right to remove any CAP customer if the program is deemed non-beneficial without having to receive the customer's consent.

N. CAP NON-PAYMENT DEFAULT AND CREDIT AND COLLECTION POLICIES

Customers who miss a CAP payment are provided two payment notifications prior to the Company initiating its termination procedures. After the customer's first missed payment, assuming the payment has not been made, the CAP CBO sends a notification to the customer at 15 days and 25 days after the missed payment. The 15-day notification may be a letter or telephone call. The 25-day notification is a mailed letter. Both the 15- and 25-day notifications advise the customer that their CAP payment is overdue.

Upon the customer's second missed CAP payment, UGI moves forward with the appropriate notifications and shut-off procedure and will send a termination notice stating the past-due amount. The customer will be required to pay the amount set forth in the termination notice, prior to the scheduled termination date to avoid shut-off. If the customer fails to pay per the terms of the termination notice, service is shut off.

When the service is shut off for non-payment, the terminated customer has up to 109 days to pay the full catch-up CAP amount, including any CAP bills that may have come due during the shut-off process, plus reconnection fees. Upon receipt of the full catch-up amount and the reconnection fee, the customer will be returned to CAP. If the terminated customer does not pay the full catch-up amount within 109 days, the customer will be removed from CAP and the customer will be responsible to make full payment of any outstanding balance and reconnections fees prior to the reconnection of service. Upon full payment and service restoration, the customer may then re-apply to enroll in CAP. One additional exception to the reinstatement policy would be when the customer's actual balance is less than the CAP balance.

UGI Utilities, Inc. Operation Share hardship funds will be permitted to be used for reconnection fees for all eligible UGI customers.

O. REINSTATEMENT POLICY

Customers requesting reinstatement must comply with and agree to all applicable program eligibility requirements and customer obligations. As a condition of reinstatement, a customer must:

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- provide adequate assurance that the reason(s) for the prior default and resulting program dismissal have been removed or corrected; and
- make up all missed CAP payments or full balance when appropriate before reinstatement.

As a condition of reinstatement, a customer may also be required, depending upon individual circumstances, to make an up-front payment. Upfront payments are most common for a customer that is looking to restore service and remain on CAP. A reconnection charge can be required as an upfront payment. Another scenario where an upfront payment is required is when it is a prerequisite for the customer's receipt of additional grants or program services. For example, if a customer owes \$500 in missed CAP payments, a CBO may require the customer to pay \$300 which permits the CBO to approve \$200 in Federal Emergency Management Agency ("FEMA") funds. The Companies never charge a CAP participant a security deposit for reconnection of service.

As stated above, UGI Utilities, Inc. Operation Share hardship funds will be permitted to be used for reconnection fees for all eligible UGI customers.

If a customer voluntarily removes themselves from CAP for seasonal short-term benefit, the customer will not be eligible again until after a one-year waiting period. The customer, however, would be able to have their CAP reinstated before the year if they, at the time of their request, can satisfy the CAP amount covering both the missed CAP payments while on CAP, and the month(s) they spent out of the program (i.e. CAP catch-up amount).

Finally, pursuant to Paragraph 48(b) of the 2022 Gas Rate Case Settlement, UGI Gas agreed to continue its outreach to active customers who have been removed from CAP due to failure to recertify. If these Gas customers submit income documentation, they will be reenrolled, and any arrearage accrued will be included with their existing pre-program arrearages.

P. CAP UNIVERSAL SERVICE REQUIREMENTS REPORTING

As required by the August 8th Order, by April 1st of each year, UGI Utilities, Inc. shall file and serve a report at these dockets detailing the following information by utility, FPIG level, and account type for the preceding calendar:

- CAP Participation Rate;
- Average Annual CAP Credits;
- Number of CAP accounts that exceeds the previous maximum CAP Credit limit;
- Total dollars above previous maximum CAP Credit limit;
- Average of CAP credits above previous maximum CAP Credits;
- Gross Write-Offs in Dollars by Residential Customers and Confirmed Low-Income Customers
- The difference in pre-program and current energy usage (+/-) of CAP customers

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who exceeded energy usage thresholds but received energy conservation assistance from a CAP caseworker (stated as an average yearly percentage)

VI. LIURP

A. INTRODUCTION

UGI's LIURP consists of a Weatherization Program and a Rehabilitation Program.

B. FUNDING AND BUDGET

See Appendix A for a more detailed discussion of the program budgets.

C. LIURP ENROLLMENT LEVELS

The table shows the number of jobs completed per Company and the associated spending for the period of 2014 through 2016.

| Company | Number of jobs | Cost |
|----------------|-----------------------|-------------|
| UGI Gas | 318 | \$2,048,978 |
| PNG | 399 | \$2,566,887 |
| CPG | 194 | \$1,131,508 |
| UGI Electric | 71 | \$287,895 |

D. LIURP REPORTING REQUIREMENTS

The Companies report all data required by the LIURP codebook.

E. LIURP WEATHERIZATION PROGRAM

The LIURP Weatherization Program is offered to reduce the energy consumption of low-income customers through the installation of energy conservation measures and energy conservation education. By reducing the energy consumption of these customers, the intent of LIURP is to reduce customer arrearage, collection and termination costs. The program places top priority on the health and safety of all LIURP participants.

Program services are provided free of charge to the customer. Upon verification of program eligibility by the LIURP agency, each LIURP heating customer will receive an on-site energy survey/audit. Energy saving measures for gas customers and electric space heat customers may include, but are not limited to, the following: insulation, furnace repair/replacement, water

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heater repair/replacement, furnace efficiency modification, windows and baseboard caulking, door and window weather stripping, door sweeps and thresholds, replacement of broken window panes, storm windows, attic ventilation, electrical outlet and switch plate gaskets on outside walls, water conservation measures, energy education, infiltration measures and incidental repairs (necessary to the effective performance of weatherization materials). Low cost energy saving measures for electric non-heating customers may include but are not limited to refrigerator replacement, high efficiency lighting, window air conditioner replacement and other measures necessary to the effective performance of weatherization materials within the job limit costs. Eligible electric non heating customers may receive an in home or telephonic energy education sessions. For the 2020-2025 USECP, UGI will begin to provide UGI Electric weatherization participants with an Energy Conservation Kit containing items they may install to reduce electric consumption.

Energy saving measures installed will be those Commission-approved measures in the LIURP codebook. Job inspections are completed by a third-party agency.

Additionally, UGI Gas will, in this 2020-2025 USECP, expand the use of LIURP Weatherization Program funds to address the repair or replacement of its residential customers' inoperable gas furnaces. UGI Gas will increase its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary.⁵¹ For LIURP jobs where Gas furnace replacement is not necessary, the per job maximum will be \$8,000. Additionally, UGI Gas will set aside \$250,000 annually from its general LIURP budget for furnace repair and replacement projects. For the first two years of the USECP, any unused amounts will roll over to the next year's budget for furnace repair and replacement projects. Should there continue to be amounts to roll over after two years, any remaining roll over amounts will roll over to UGI Gas's general LIURP budget up until 2022. Thereafter, per Paragraph 44(a) the 2022 Rate Case Settlement, UGI Gas will increase its general LIURP budget by \$250,000: (1) beginning January 1, 2023; and (2) beginning January 1, 2024. Effective January 1, 2024, the general LIURP budget shall remain unchanged until the Commission approves a change thereto. However, if more than 25% of the general LIURP budget remains unspent on or after January 1, 2025, or in each year thereafter, the Company will take reasonable efforts to spend the funds within the first 6 months of the next year. If, after reasonable efforts are undertaken to spend the unspent funds within the 6 month period, funds still remain, they will not roll forward. In its August 8, Order, the Commission has approved UGI Gas's petition to waive the LIURP regulation payback requirement at 52 Pa. Code § 58.11(a) and the high-use criteria at 52 Pa. Code § 58.10(a)(1) for customers needing furnace repair or replacement.

1. Weatherization Program Administration

Refer to **Appendix D** for the CBOs currently contracted for the provision of energy survey and measure installation. Per Paragraph 59(a) of the 2023 Electric Rate Case Settlement, within 60 days after the final order is entered in that proceeding, which occurred on September 21, 2023,

⁵¹ Pursuant to Paragraph 44(b) of the 2022 Gas Rate Case Settlement, UGI Gas increased its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary.

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UGI Electric agreed to issue an RFP for an additional LIURP resource, including CBOs in UGI Electric's service territory, capable of performing 20 additional baseload and 10 additional heating jobs annually. UGI issued the RFP on October 18, 2023 and responses were due by December 1, 2023 at noon. UGI Electric awarded the bid to Agency for Community Empowerment of NEPA in December 2023 to perform the 20 additional baseload and 10 additional heating jobs annually, beginning February 1, 2024.⁵² In addition, UGI engages a third-party to independently verify that home weatherization was completed in accordance with LIURP standards.

2. Weatherization Program Eligibility

To be eligible for the LIURP Weatherization Program, the customer must be able to demonstrate the following:⁵³

- the customer is an active residential gas heating customer or residential electric customer;⁵⁴
- the customer's gross household income is at or below the current 150% of the FPIG (for UGI Electric customers and for UGI Gas customers up until 2023);⁵⁵
- the customer's gross household income is between 151 and 200% of the FPIG, for UGI Gas customers, beginning January 2023;⁵⁶ and for UGI Electric customers, beginning January 1, 2024 (pursuant to Paragraph 59(b) of the 2023 Electric Rate Case Settlement). Also in accordance with Paragraph 59(b) of the 2023 Electric Rate Case Settlement, for UGI Electric customers between 151% and 200% FPL, beginning January 1, 2024, a limit of 20% of the overall Electric LIURP budget shall apply for jobs related to Electric customers falling between 151% and 200% FPL.⁵⁷
- the customer's annual consumption is above average usage; Above average usage is defined as a customer who exceeded the average residential threshold by 25% for electric customers (baseload and heat) and 30% for natural gas customers. The threshold will be reviewed annually to consider significant changes in usage patterns.

⁵² [March 4th Filing.](#)

⁵³ Exceptions may be granted.

⁵⁴ UGI Gas will waive the requirement that the customer be an active gas heating customer for the purpose of furnace repair or replacement spending.

⁵⁵ However, up to 20% of LIURP participants may have a household income at 151-200% of the FPIG, on a first-come, first-serve basis.

⁵⁶ Per Paragraph 44(c) of the 2022 Gas Rate Case Settlement, UGI Gas expanded LIURP access to Gas customers between 151% and 200% of the FPIG to commence on January 1, 2023.

⁵⁷ [March 4th Filing.](#)

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| Division | High Usage |
|-----------------|-----------------------|
| UGI Gas | 877 ccf ⁵⁸ |
| UGI Electric | 12,788 kwh |

- the customer has had continuous service for twelve months;
- the customer's premises are suitable for weatherization services;⁵⁹ and
- the customer's premise is the customer's primary residence.⁶⁰
- The premise has not received LIURP weatherization services for the past seven (7) years.

Residential accounts with the following indicators are not eligible for the LIURP Weatherization Program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner's name);
- utility service used to operate a swimming pool
- a residential property where more than fifty percent of the anticipated gas usage served through a single meter is used to operate the business.

3. Weatherization Program Outreach and Intake Efforts

UGI is in constant contact with weatherization CBOs, local government, weatherization providers and any other appropriate agencies for input and advice on the most efficient and effective methods to provide LIURP weatherization services without duplication or exclusion. Through the use of local CBOs, such as LIURP providers found in **Appendix D**, integration of

⁵⁸ Per Paragraph 44(d) of the 2022 Gas Rate Case Settlement, no later than January 27, 2023, UGI Gas will lower its LIURP minimum usage threshold to 73.1 Ccf per month for customers at or below 200% FPIG. The 877 ccf in Table 6 represents the monthly 73.1 ccf amount totaled over a 12 month period.

⁵⁹ Program measures follow applicable payback periods; therefore, a customer's residence that has been previously weatherized may not be eligible for LIURP until the applicable payback period has expired.

⁶⁰ The program is available to both homeowners and renters. Renters can qualify with written permission from landlords.

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federal, state and local funds for LIURP weatherization participants are more easily accomplished. UGI will inform each LIURP weatherization participant of any and all appropriate services.

4. Weatherization Program Identification & Referral of Low-Income Customers

With the use of COS for the administration of LIURP, UGI reviews its customer records to identify high usage, high arrearage, low income customers. In addition, UGI accepts referrals from CBOs, community groups and customer inquiries. LIURP referrals may also come from UGI's Energy Efficiency and Conservation Plan program management.

5. Weatherization Program Inter-Utility Coordination

UGI maintains contact with appropriate gas and electric utilities within their service territory to initiate inter-utility coordination with both NGDCs and EDCs when applicable.⁶¹ UGI and the other utilities coordinate comprehensive program services to better serve LIURP weatherization customers. In many cases, UGI and the corresponding utility employ the same LIURP measure installer. Therefore, inter-utility coordination may be accomplished without the need for written contract or inter-utility billing. As previously stated in the CAP section, UGI will form a USAC which will hold two annual meetings. UGI will include the electric utilities that overlap its gas service territory to these meetings to continue to discuss the coordination of the provision of LIURP services, and particularly, to improve identification of customers with inoperable natural gas furnaces who may be using electricity for space heating so as to improve the provision of LIURP services for those customers.

F. REHABILITATION PROGRAM

Through the Rehabilitation Program, UGI funds the installation of energy efficient measures at the time of construction or rehabilitation of low-income residential housing. These measures include the installation of ENERGY STAR rated high efficiency natural gas furnaces, hot water heaters, upgraded installation, and energy efficient windows.

The Rehabilitation Program achieves usage reduction by: (1) allowing identified low-income and special needs customers to benefit from a variety of energy efficient measures which will avoid future high usage, and (2) maximizing the LIURP dollars spent on installed weatherization measures. Specifically, this program treats low income housing at the construction/rehabilitation phase in order to maximize material and labor dollars. The expectation is that these homes could eventually receive LIURP services. Therefore, through this program, these customers receive service at the construction/rehabilitation phase to assist in covering the costs of the project(s) and to avoid future high usage and arrearage problems. By implementing energy efficiency measures at the rehabilitation or construction phase, the overall cost of the

⁶¹ UGI restates its commitment to coordinating with EDCs in overlapping service territories who may be providing similar services pursuant to Act 129.

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measures can be more economical than implementing them after the construction is complete. UGI periodically joins forces with rehabilitation projects within its service area to assure energy efficiency in low income housing.

1. Rehabilitation Program Eligibility

Each Rehabilitation Program project must have the following criteria to qualify for LIURP services and/or funds:

- the customer is an active residential gas heating customer or residential electric customer;
- the customer's premise is the customer's primary residence.⁶²
- the customer's gross household income is at or below the current 200% of the FPIG; and
- existing gas heat or electric heating customer;⁶³ and
- coordination with a CBO(s).

Possible CBOs that would become involved in this project include:

- Neighborhood Housing Services;
- Habitat for Humanity;
- Housing Authorities; and
- Community Development Offices.

Residential accounts with the following indicators are not eligible for the LIURP Rehabilitation Program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner's name);
- utility service used to operate a swimming pool.
- a residential property where more than fifty percent of the anticipated gas usage served through a single meter is used to operate the business.

All LIURP required information will be collected for each dwelling.

UGI will reserve up to 10% of its total current year LIURP budget for Rehabilitation Project Funding. If the entire budgeted amount is not expended, the remainder will be returned to

⁶² The program is available to both homeowners and renters. Renters can qualify with written permission from landlords.

⁶³ Customers of UGI-Electric with electric heat are eligible to participate in the LIURP Rehabilitation Program.

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traditional LIURP services funding.

As with the 2014-2017 USECP, UGI: (1) will limit the use of LIURP funding under this program to residential rate housing units and, in the case of rental housing units, only where the tenant has payment responsibilities for the utility service; (2) may direct funds to HOME developments, the Low Income Housing Tax Credit (“LIHTC”) program and to non-profit agencies; and (3) will track customer participation levels and energy savings on a prospective basis.

In the 2020-2025 UGI will continue to track and report the program results and details separately.

UGI 2020-2025 USECP

APPENDIX A

FUNDING COMMITMENTS FOR EACH UNIVERSAL SERVICE PROGRAM

I. UGI PROJECTED PARTICIPATION AND BUDGET PER PROGRAM

Projected participation and budgets for USECP programs are set forth below. For LIURP and Operation Share, participation and budget figures are provided for the geographic footprints of the UGI Gas Division's former three rate districts in accordance with settlement paragraph 38 of the 2019 UGI Gas Rate Case Settlement.

A. CAP

1. UGI Gas

UGI Gas's projected participation levels and budget for CAP is shown:

| Year | Projected Participation Levels | Projected Budget |
|------|--------------------------------|------------------|
| 2020 | 27,813 | \$15,019,020 |
| 2021 | 23,237 | \$10,004,469 |
| 2022 | 26,781 | \$13,361,408 |
| 2023 | 29,963 | \$14,949,200 |
| 2024 | 33,549 | \$16,738,000 |
| 2025 | 37,602 | \$18,760,214 |

2. UGI Electric

UGI Electric's projected participation levels and budget for CAP is shown below:

| Year | Projected Participation Levels | Projected Budget |
|------|--------------------------------|------------------|
| 2020 | 3,702 | \$3,954,056 |
| 2021 | 3,179 | \$2,141,773 |
| 2022 | 3,664 | \$4,123,879 |
| 2023 | 4,099 | \$4,612,896 |
| 2024 | 4,589 | \$5,165,083 |
| 2025 | 5,144 | \$5,789,179 |

B. LIURP

The projected LIURP participation levels and budgets for the geographic footprint of the former UGI Gas rate districts, and the UGI Electric service territory are set forth in tables A-3 and A-4.

UGI 2020-2025 USECP

APPENDIX A

| Table A-3.⁶⁴ LIURP Participation Levels & Budget - 2023⁶⁵ | | |
|--|---------------------------------------|-------------------------|
| Geographic Area | Projected Participation Levels | Projected Budget |
| South | 202 | \$1,795,292 |
| North | 194 | \$1,428,162 |
| Central | 85 | \$740,896 |
| UGI Electric | 66 | \$298,379 |

| Table A-4. LIURP Participation Levels & Budget - 2024-2025 | | |
|---|---------------------------------------|-------------------------|
| Geographic Area | Projected Participation Levels | Projected Budget |
| South | 202 | \$1,949,485 |
| North | 194 | \$1,493,274 |
| Central | 85 | \$771,591 |
| UGI Electric | 66 | \$298,379 |

C. OPERATION SHARE HARDSHIP FUND

| Table A-5. UGI Operation Share Company Annual Funding Level for 2020 – 2025⁶⁶ | | |
|---|------------------------------|---|
| Geographic Area | Energy Funds Amount | |
| South | \$310,500 | |
| North | \$177,500 | |
| Central | \$96,500 | |
| Electric | \$80,500 117,423 | |
| Subtotal | \$665,000 701,923 | |
| Total | | \$665,000701,923⁶⁷ |

⁶⁴ Upon reviewing the LIURP budgets for the October 28th Filing, it was determined that the total Projected Budget amount was never updated in Table A3 to include \$80,000 from Paragraph 28(d)(iii) in UGI Gas’s 2020 Base Rate Case Settlement at Docket No. R-2019-3015162. According to that settlement provision, UGI Gas agreed that beginning July 1, 2021, it would increase the annual LIURP budget by an amount proportionate to the percentage distribution rate increase for the Residential class, which equaled \$80,000 per year on a calendar basis. While UGI Gas inadvertently omitted this amount from Table A3 previously, UGI Gas entered the \$80,000 into its annual LIURP budget. Accordingly, UGI Gas is adding the previously omitted \$80,000 figure into the annual LIURP budget in Table A3.

⁶⁵ The 2022 Gas Rate Case Settlement increased the aggregate UGI Gas LIURP budget by \$250,000 in 2023 and 2024. The increased budget amounts were allocated between the different geographic areas of the service territory.

⁶⁶ While Table A-5 does not include employee or Customer donations, the Company will match the annual amount of donations received. Additionally, per the 2022 Gas Rate Case Settlement, the Company agreed to make a one-time payment of \$500,000 during the winter of 2022-2023. Because the \$500,000 will be a one time payment, it was not reflected in Table A-5 because that table states what the annual budget amounts will be over a 5 year period.

UGI 2020-2025 USECP

APPENDIX A

| Table A-6. UGI Operation Share Annual Costs by Geographic Area for 2020 – 2025⁶⁸ | | | | | | |
|--|---------------------------------------|---------------------------------------|--|---------------------------------|------------------------|---|
| Geographic Area | Projected Participation Levels | Initial Contribution (voucher) | | Projected CASH donations | Total Donations | Projected Administrative Budget⁶⁹ |
| South | 385 | \$310,500 | | \$80,000 | \$390,500 | \$5,775 |
| North | 185 | \$177,500 | | \$20,000 | \$197,500 | \$2,775 |
| Central | 120 | \$96,500 | | \$26,000 | \$122,500 | \$1,800 |
| Electric | 98 | \$80,500 | | \$35,000 | \$115,500 | \$1,470 |

UGI proposes to allocate available funds to administering agencies, based on the 2010 Census Data, as updated in 2015, and the Commission’s estimate of the number of residents under 150% of the FPIG, as follows:

⁶⁸ Cash donations are donations provided by utility customers.

⁶⁹ The increase is due to per-grant CBO fee increase from \$10 to \$15.

UGI 2020-2025 USECP

APPENDIX A

| Table A-7. UGI Allocations by Geographic Area | | |
|--|---|--------------------------------------|
| Former Rate District | Agency | Inter-Area Funding Allocation |
| UGI South | Allentown Salvation Army | 15% |
| | Bethlehem Salvation Army | 5% |
| | Easton Salvation Army | 10% |
| | Harrisburg Salvation Army | 21% |
| | Hazleton Commission on Economic Opportunity | 3% |
| | Lancaster Community Action Program | 19% |
| | Lebanon Christian Ministries | 5% |
| | Reading Salvation Army | 12% |
| | NHS | 10% |
| North | AGAPE | 7% |
| | Commission on Economic Opportunity | 35% |
| | Scranton Salvation Army | 38% |
| | S.T.E.P., Inc. | 11% |
| | TREHAB, Inc. | 2% |
| | Union-Snyder Community Action Agency | 7% |
| Central | Central PA Community Action | 8% |
| | Central Susquehanna Opportunities | 12% |
| | East Stroudsburg Salvation Army | 6% |
| | Hamburg Salvation Army | 20% |
| | Commission on Economic Opportunity | 8% |
| | Northern Tier Community Action Corp | 14% |
| | Schuylkill County Community Action | 5% |
| | S.T.E.P., Inc. | 2% |
| | TREHAB, Inc. | 24% |
| | Union-Snyder Community Action Agency | 1% |

Each administering agency must spend their share of donations in order to maintain the allocation of funds; otherwise, UGI reserves the right to reallocate the funds to another administering agency. Furthermore, if and when there is a change to the existing administering agencies, such as, for example, an addition or removal of an agency, UGI will revise the amounts allocated to the administering agencies accordingly.

UGI 2020-2025 USECP

APPENDIX A

D. CARES

UGI Gas's projected participation levels and budget for LIHEAP and CARES Outreach are shown below:

| Table A-8. UGI Gas CARES Participation Levels & Budget 2020-2025 | |
|---|-------------------------|
| Projected Participation Levels | Projected Budget |
| 185 | \$115,000 |

UGI Electric's projected participation levels and budget for CARES is shown below:

| Table A-9. UGI Electric CARES Participation Levels & Budget 2020-2025 | |
|--|-------------------------|
| Projected Participation Levels | Projected Budget |
| 20 | \$20,000 |

II. UGI RIDER USP

In accordance with the Company's Gas Tariff⁷⁰ and Electric Tariff⁷¹ available at <https://www.ugi.com/tariffs/>, UGI is permitted to recover costs for the USECP under its USP Riders with an annual reconciliation for costs and recoveries. The Rider USP rate shall be calculated to recover costs for the following programs: LIURP; CAP; Hardship Funds; and any other replacement or Commission-mandated Universal Service Program or low-income program that is implemented during the period that the Rider is in effect.

⁷⁰ UGI Gas – Pa. P.U.C. No. 7.

⁷¹ UGI Electric Pa. P.U.C. No. 6.

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APPENDIX B

PROJECTED NEEDS ASSESSMENT

Per 52 Pa. Code § 62.4(b)(3), NGDCs with more than 100,000 residential accounts are required to provide a projected needs assessment for each Universal Service Program component and provide an explanation of how each program component responds to one or more identified needs. Per 52 Pa. Code § 62.7, UGI did not conduct a projected needs assessment for the former Central Rate District as it served fewer than 100,000 residential accounts. Likewise, UGI Electric is not required to conduct a projected needs assessment since it serves fewer than 60,000 residential accounts, as per 52 Pa. Code § 54.77.

The needs assessment for the former UGI South and UGI North Rate Districts, based on 2015 Census Data, included the number of estimated and identified low-income customers, the number of estimated and identified payment-troubled, low-income customers, the number of customers still needing LIURP services and the cost to serve them and the enrollment size of CAP to serve all eligible customers.

| Table B-1. | | |
|--|-------------------------|-------------------------|
| | <u>UGI SOUTH</u> | <u>UGI NORTH</u> |
| 1. Number of Identified Low-Income Customers | 34,269 | 23,061 |
| 2. Estimate of Number of Low-Income Customers | 91,478 | 49,410 |
| 3. Number of Identified Payment-Troubled, Low-Income Customers | 8,353 | 4,663 |
| 4. Number of Customers in Need of LIURP Services | 5,251 | 4,756 |
| 5. Cost of Serving the Number of Customers in Need of LIURP Services | \$36,142,633 | \$28,131,740 |
| 6. Enrollment Size of CAP to Serve all Eligible Customers | 34,269 | 23,061 |

In future USECPs the Company will provide a consolidated needs assessment for the Gas Division that will incorporate all former rate districts.

⁷² 52 Pa. Code § 62.4 requires the inclusion of estimated low-income payment-troubled customers in a NGDC's needs assessment. Due to the methodology employed by the UGI Companies, this figure is equal to the identified payment-troubled low-income customers set forth in line 3 and is not repeated to avoid redundancy.

⁷³ This figure accounts for the following eligibility criteria: (1) identified low-income; (2) 12 months of consecutive service; (3) meeting LIURP usage criteria; (4) premises not having received LIURP weatherization services within the past seven (7) years. The UGI Companies may grant exceptions where warranted on a case-by-case basis to customers who do not meet this eligibility criteria and will report exceptions annually to the Commission.

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APPENDIX C

CAP COMMUNITY BASED ORGANIZATIONS

| Table C-1. | | |
|--|-------------------------------------|---------------------------------|
| <u>CBO</u> | <u>Communication Methods</u> | <u>Geographic Region</u> |
| Commission on Economic Opportunity | Mail, Email, & Fax | All Gas and Electric |
| Easton Area Neighborhood Center | Mail, Email, & Fax | South |
| Lancaster CAP | Mail, Email, & Fax | South |
| Lebanon County Christian Ministries | Mail, Email, & Fax | South |
| Neighborhood Housing Services of Greater Berks, Inc. | Mail, Email, & Fax | South |
| The Salvation Army | Mail, Email, & Fax | South |
| AGAPE | Mail, Email, & Fax | North |
| Scranton Lackawanna Human Development Agency-SLHDA | Mail, Email, & Fax | North |
| Social Service Assistance Program - S.T.E.P., Inc. | Mail, Email, & Fax | North, Central |
| TREHAB, Inc. | Mail, Email, & Fax | North, Central |
| Union-Snyder Community Action Agency | Mail, Email, & Fax | North, Central |
| Central PA Community Action Program, Inc. | Mail, Email, & Fax | Central |
| Central Susquehanna Opportunities, Inc. | Mail, Email, & Fax | Central |
| Northern Tier Community Action Agency/SLHDA | Mail, Email, & Fax | Central |
| Schuylkill County Community Action | Mail, Email, & Fax | Central |

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APPENDIX D

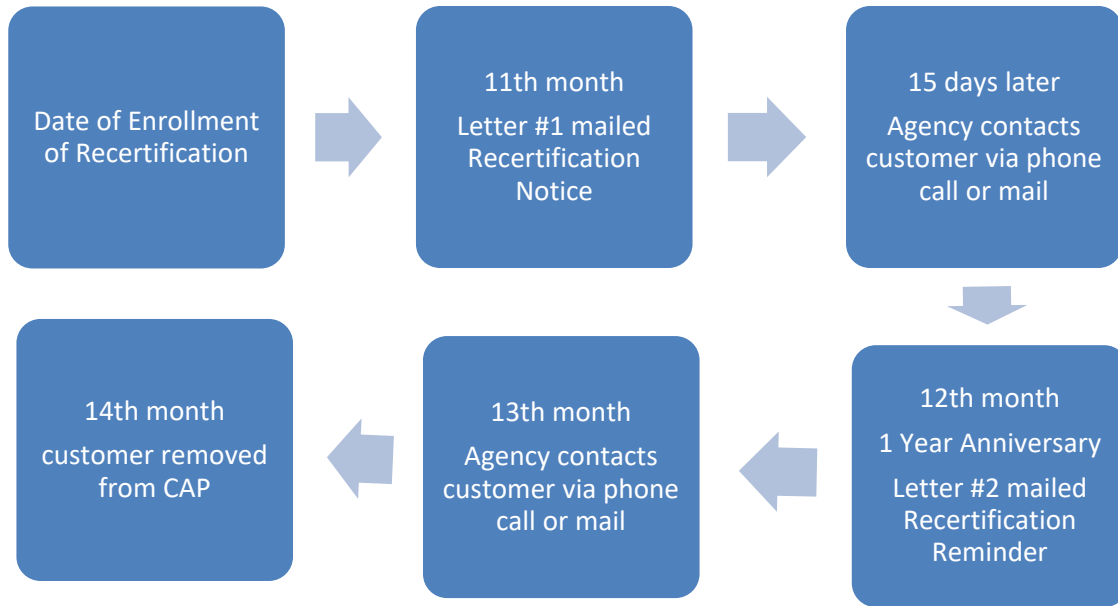
LIURP AGENCIES

| Table D-1 | | |
|---|-----------------------|-------------------------------|
| <u>CBO</u> | <u>City</u> | <u>Geographic Area</u> |
| Berks Community Action Program | Reading | South, Central |
| Commission on Economic Opportunity | Kingston | South, North, Electric |
| Community Action Committee of the Lehigh Valley and Central PA | Bethlehem, Clearfield | South |
| Central PA Community Action | Clearfield | Central |
| Northern Tier Community Action | Emporium | Central |
| South Central Community Action Program | Gettysburg | South |
| Scranton- Lackawanna Human Development Agency now known as Agency for Community Empowerment of NEPA | Scranton | North, Central, Electric |
| SOLAIR, Inc. | Ralston | Electric |
| SEDA-COG | Canton, Lewisburg | North, Central |
| Carbon County Action Committee for Human Services | Lehighton | Central |
| Advanced Efficiency Worx | York | South |
| CLEARResult | Scotrun | South, Central |
| | | |
| Green Kite | Gratz | South, Central |
| MT Weatherization | Hummelstown | South |
| Harron's Insulation and Ceilings | Reading | South |
| | | |
| York Home Performance | York | South |

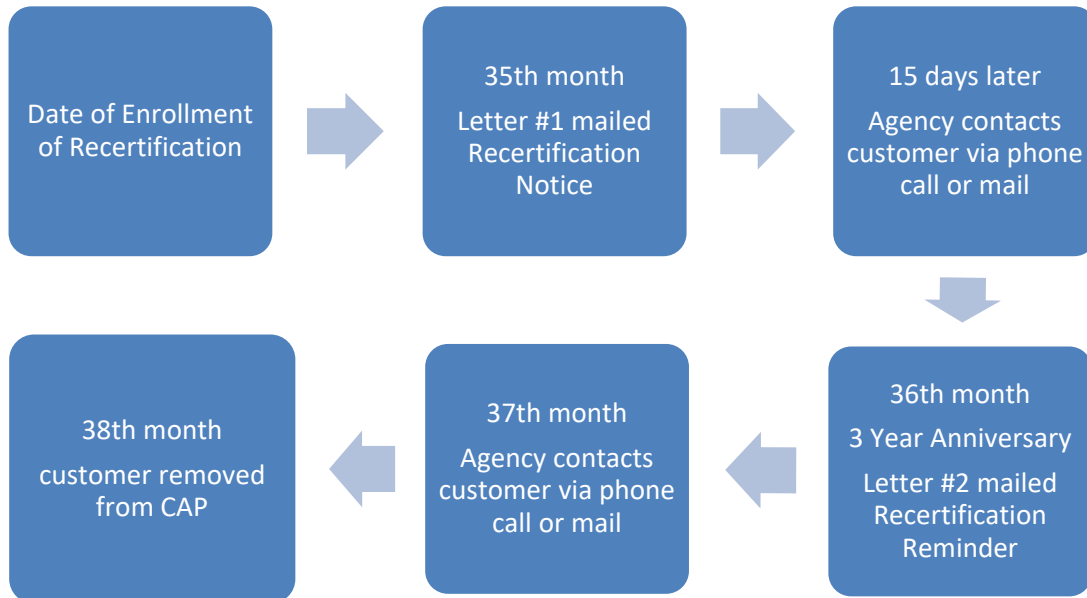
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APPENDIX E

Notification Schedule for CAP Recertification Process-NO LIHEAP (Annual Certification)



Notification Schedule for CAP Recertification Process-LIHEAP (Triennial Certification)



UGI 2020-2025 USECP

APPENDIX F

**UGI
Universal Service Customer Assistance Program**

Customer Name: _____

Date of Application: _____

Account #: _____

Service Address: _____

Verification of Zero Income Claim

To be completed and signed by the UGI customer who had no income during the 30-day, 90 day or 1-year period before the date of this CAP application.

Verification:

I, (print) _____, state that I have had no income from any source. I understand that participation in CAP can be denied for making false statements and do affirm that all claims made here are true and correct to the best of my knowledge, information and belief. Any change in household income or occupants will be immediately reported to my assigned CAP agency. I give UGI and/or my assigned CAP agency permission to verify income with government agencies.

List all adult household members with zero income:

1. _____
2. _____
3. _____

During the above period, how were household expenses met for food and shelter?

Customer Signature: _____

Agency Representative: _____

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APPENDIX G



CAP- Agency Audit Scorecard

Agency _____

Account Number _____ Customer Name _____

Does the account being audited contain the following:

- | YES | NO | N/A | |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | | APPLICATION |
| <input type="checkbox"/> | <input type="checkbox"/> | | CONSENT AND RELEASE FORM |
| <input type="checkbox"/> | <input type="checkbox"/> | | TRUTH OF STATEMENT |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | PROOF OF INCOME |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | PROOF OF IDENTIFICATION |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOCUMENTATION ON THE ACCOUNT LOG |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOES THE INFORMATION ENTERED IN COS MATCH THE APPLICATION? |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOES THE PROOF OF INCOME INFORMATION MATCH THE APPLICATION? |
| <input type="checkbox"/> | <input type="checkbox"/> | | COMPLIES WITH RECORD RETENTION POLICY |

The following may not be applicable for all accounts:

- | YES | NO | N/A | |
|--------------------------|--------------------------|--------------------------|--------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | RECERTIFICATION FORM COMPLETED |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | HIGH USAGE QUESTIONNAIRE |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ZERO INCOME FORM |

Auditor Comments _____

Auditors Initials _____

Date _____



UGI Utilities, Inc. – Gas Division
UGI Utilities, Inc. – Electric Division

**Universal Service & Energy Conservation Plan
For the Five-Year Period
January 1, 2020 – December 31, 2025**

Docket Nos. M-2017-2598190
M-2019-3014966

Filing Date: June 30, 2017
Revised: November 1, 2018
Revised: September 6, 2019
Revised: October 11, 2019
Revised: October 24, 2019
Revised: December 6, 2019
Revised: July 18, 2022
Revised: October 28, 2022
Revised: December 28, 2022
Revised: March 4, 2024

UGI 2020-2025 USECP

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UGI 2020-2025 USECP

I. INTRODUCTION

UGI Utilities, Inc. (“UGI”) hereby submits this revised Universal Service and Energy Conservation Plan (“USECP” or “Plan”) for the five-year period January 1, 2020 through December 31, 2025 to the Pennsylvania Public Utility Commission (“PUC” or “Commission”) for its review and approval in accordance with the Commission’s *Universal Service and Energy Conservation Reporting Requirements* at 52 Pa. Code §§ 54.71 – 54.78 and §§ 62.1 – 62.8.¹ The USECP replaces and supersedes the UGI Companies’ Universal Service and Energy Conservation Plan for the four-year period of January 1, 2014 through December 31, 2017 (the “2014-2017 USECP”) previously approved by the Commission at Docket No. M-2013-2371824 by orders entered January 15, 2015, June 11, 2015 and September 3, 2015. The USECP pertains to the universal service programs of UGI’s Electric Division (“UGI Electric”) and Gas Division (“UGI Gas”). This Plan incorporates the modifications required by the Commission’s Order entered August 8, 2019 (“August 8th Order”) and the Commission approval of the settlement in the UGI Gas base rate proceeding at Docket No. R-2018-3006814 (Order entered October 4, 2019) (“2019 Rate Case Order”). Additionally, this Plan incorporates, as well as, revises Customer Assistance Program enrollment and budget projections associated with revised CAP percent of income plan projections approved by Commission Order (entered on June 16, 2022) at Docket Nos. M-2019-3014966 and P-2020-3019196. Moreover, this Plan is being revised per the Company’s October 28, 2022 filing to revise the USECP for 2020-2025 in Docket No. M-2019-3014966 (“October 28th Filing”). The Plan incorporates modifications to the USECP required by the Commission’s Order entered September 15, 2022 (“September 15th Order”) and the Commission’s approval of the Settlement in the UGI Gas base rate proceeding at Docket No. R-2021-3030218 (“2022 Gas Rate Case Settlement”), which were filed on October 28, 2022. Further, the Plan incorporates two clarifications required by the Commission’s December 8, 2022 Secretarial Letter (i.e., when LIURP benefits will be available to customers at 151%-200% of the Federal Poverty Income Guidelines and what “Warm Referrals” are). Finally, the Plan incorporates modifications to the USECP pursuant to the Commission’s Order entered September 21, 2023, and the Commission’s approval of the Settlement in the UGI Electric base rate case proceeding at Docket Nos. R-2022-3037368, et al., which are being filed on March 4, 2024. (“March 4th Filing”).

This 2020-2025 USECP sets forth the rules, terms and conditions and funding levels under which UGI will administer its universal service and energy conservation programs and policies (“Universal Service Programs” or “USPs”) to eligible customers for the period of January 1, 2020 through December 31, 2025. **Appendix A** of the Plan sets forth the committed funding levels and budgets for each of the UGI divisions during this time period. **Appendix B** of the Plan sets forth the projected needs assessment as required by the Commission’s regulations at 52 Pa. Code

¹ By Order entered on October 3, 2019 at Docket No. M-2019-3012601 (“October 3rd Order”), the Pennsylvania Public Utility Commission granted temporary partial limited waivers of 52 Pa. Code §§ 54.74, 54.76 (a-b), 62.4, and 62.6 (a-b) to natural gas and electric distribution companies for the purpose of adhering to the 2020-2025 universal service and energy conservation plan and universal services impact evaluation filing schedule provided therein. The term of the UGI USECP is therefore 2020 through 2025.

UGI 2020-2025 USECP

§ 62.4(b)(3).² **Appendices C & D** provide a list of third-party, community-based organizations (“CBOs”) to be utilized by UGI to assist in administering the Universal Service Programs. **Appendix E** sets forth UGI’s notification process to prompt customers to recertify for CAP. **Appendix F** provides the Zero Income form to be used for CAP. **Appendix G** provides the CAP Agency Audit Scorecard.

UGI Gas is a “public utility” and a “natural gas distribution company” (“NGDC”) as defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2202, and is subject to the regulatory jurisdiction of the Commission. UGI Gas provides natural gas distribution service and supplier of last resort (“SOLR”) service. UGI Gas combined serves approximately 585,000 residential customers in 46 counties.

UGI Electric is a “public utility” and an “electric distribution company,” as defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2803, and is subject to the regulatory jurisdiction of the Commission. UGI Electric provides electric distribution, transmission and default supply services to customers located in its certificated service territory. UGI Electric furnishes electric distribution service to approximately 54,000 residential customers located in portions of two northeastern Pennsylvania counties (Luzerne and Wyoming counties).

On October 1, 2018 UGI Penn Natural Gas, Inc. (“PNG”) and UGI Central Penn Gas, Inc. (“CPG”) merged into UGI Utilities, Inc. Data prior to October 1, 2018 may reference the UGI Distribution Companies and individually, the former PNG, CPG, and UGI Utilities, Inc. – Gas Division corporate entities then in existence. References to “UGI Gas” pre-October 1, 2018 refer to the UGI Utilities, Inc. – Gas Division operations.

II. 2020-2025 USECP OVERVIEW

A. SUMMARY OF THE 2020-2025 USECP

1. USECP Programs

To assist low-income and payment-troubled customers located in their service territories, UGI has established the USECP in accordance with the Commission’s regulations. UGI’s Universal Service Programs include the following:

- Customer Assistance and Referral Evaluation Services (“CARES” or the “CARES Program”);

² The needs assessment was calculated for the former UGI North and UGI South Rate Districts. The UGI Central Rate District was not required to conduct a projected needs assessment since it serves fewer than 100,000 residential accounts. See 52 Pa. Code § 62.7. Per the October 3rd Order these rate districts are no longer in existence. For the Company’s next USECP, the needs assessment for UGI Gas will be calculated on a combined basis. UGI Electric is not required to conduct a projected needs assessment since it serves fewer than 60,000 residential accounts. See 52 Pa. Code § 54.77.

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- Hardship Fund or the “Operation Share Energy Fund”;
- Customer Assistance Program (“CAP”); and
- Low Income Usage Reduction Program (“LIURP”).

UGI also actively encourages payment-troubled, low-income customers to apply for grants from the Low-Income Home Energy Assistance Program (“LIHEAP”).

2. Customers Served

In 2016, the UGI Distribution Companies assisted approximately 51,000 residential customers through their Universal Service Programs. The total number of participants by program for UGI Gas, UGI Electric, PNG and CPG in 2016 is set forth in Table 1: (CAP customer counts are as of 12/31/16).

| Table 1. Universal Service Customers Served in 2016 | | | | | | |
|--|---------------|--------------|-----------------------|--------------------------|----------------------|---------------|
| Number of Participants | CAP | LIURP | CARES* | | Hardship Fund | Total |
| | | | CARES referral | LIHEAP recipients | | |
| UGI Gas | 7,126 | 124 | 171 | 11,816 | 698 | 19,935 |
| PNG | 5,146 | 149 | 67 | 11,906 | 521 | 17,789 |
| CPG | 1,861 | 47 | 6 | 4,961 | 231 | 7,106 |
| UGI Electric | 2,322 | 16 | 16 | 2,734 | 167 | 5,255 |
| Total | 16,455 | 336 | 260 | 31,417 | 1,617 | 50,085 |

*CARES consists of number of CARES customer and # of LIHEAP (Cash and Crisis) recipients

A summary of the UGI Distribution Companies’ program expenditures for the Universal Service Programs in 2016 is found below:

| Table 2. 2016 Universal Service Program Expenditures | | | | | |
|---|--------------------|--------------------|------------------|----------------------|--------------------|
| Company | CAP | LIURP | CARES | Hardship Fund | Total |
| UGI Gas | \$2,470,473 | \$853,543 | \$68,108 | \$6,980 | \$3,399,105 |
| PNG | \$2,137,094 | \$881,288 | \$36,617 | \$5,210 | \$3,060,209 |
| CPG | \$735,806 | \$294,362 | \$17,040 | \$2,310 | \$1,049,518 |
| UGI Electric | \$1,848,644 | \$76,960 | \$16,797 | \$1,670 | \$1,944,071 |
| Total | \$7,192,018 | \$2,106,153 | \$138,562 | \$16,170 | \$9,452,903 |

3. Administration

UGI has dedicated employees who are trained and committed to ensuring eligible

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customers are referred to all appropriate Universal Service Programs (“USP Staff”) in order to provide the greatest benefits to customers. The USP staff is structured as follows:

- Senior Manager, Customer Programs³ (1 full-time): Responsible for strategy, supervision, and regulatory reporting.
- Senior Director, Customer Success & Community Relations⁴ (1 full-time): Responsible for compliance and call centers.
- Manager, Universal Services⁵ (1 full-time): Responsible for the day to day supervision of the group and all reporting requirements.
- Senior Customer Outreach Coordinator (1 full-time): Primarily responsible for training UGI staff and CBO caseworkers.
- Senior Customer Outreach Representative (2 full-time): Responsible for leadership support of Outreach team and the CBOs.
- Customer Outreach Representatives (6 full-time): Responsible for the day to day operations of LIURP, CAP, Operation Share Energy Fund, CARES and LIHEAP. Each maintains daily contact with the CBOs responsible for the administration of each program.
- LIHEAP Outreach Representatives (3 full-time)⁶: Responsible for the day to day operations of LIHEAP. Each maintains daily contact with CBOs responsible for the administration of LIHEAP.

UGI contracts with CBOs to assist the USP Staff in customer referrals and administration of the USPs. Together, the USP Staff and the CBOs have the capability to screen, enroll and refer customers for all available Universal Service Programs. The USP Staff incorporates all Universal Service Program referrals into existing processes (Cold Weather Interim Procedure (“CWIP”), collection, compliance and contract management). In addition to referrals to all Universal Service Program components, referrals are also made to LIHEAP and State Weatherization programs.

4. Communication

There are numerous means by which the USP Staff and its CBO partners provide residential customers with information on available programs and assist them in receiving

³ In October 2021, the Senior Manager Customer Programs position was created replacing the former Senior Manager, Credit Collections & Regulatory Compliance position.

⁴ In September 2021, the Director, Customer Service position was eliminated.

⁵ In March 2022, the Manager Universal Services position was created replacing the former Customer Outreach Senior Supervisor position.

⁶ In February 2020, UGI moved from four to three full-time LIHEAP Outreach Representatives.

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assistance from CBOs. Information about the USPs is delivered to customers via regular bill inserts and through the USP Staff upon customer inquiry. UGI has a dedicated toll-free telephone number, 1-800-UGI-WARM that customers can call to get program information. UGI also maintains a page on its website that provides information on universal service programs and eligibility: <https://www.ugi.com/customer-services/customerassistance/>.

As stated in more detail in the summary of plan changes, with this 2020-2025 USECP UGI is creating additional communication channels with their customers by permitting its customers to apply and/or recertify for CAP over the phone with provision of supportive documentation through mail, or additional means, as permitted by the CBOs. Additionally, in accordance with Paragraph 45 of the 2022 Gas Rate Case Settlement, the Company agreed to provide detailed information regarding its USP, targeted at UGI Gas customers who recently converted to natural gas, in its new customer welcome packet.⁷ Moreover, pursuant to Paragraph 60(a) - (c) of the 2023 Electric Rate Case Settlement, UGI Electric agreed to: (1) solicit Electric customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company's CAP two times a year until at least the effective date of the Company's next USECP; (2) accept verbal self-reported income eligibility for Electric customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other Electric customer contact with the call center for an unpaid bill; and (3) automatically enroll Electric LIHEAP recipients into CAP according to specific conditions.⁸

B. SUMMARY OF CHANGES TO PLAN

As required by Section 62.4 of the Commission's regulations, 52 Pa. Code § 62.4, this section of the Plan describes the modifications and enhancements made to UGI's Commission-approved 2014-2017 USECP. Set forth below is a description of the changes made to the individual Universal Service Programs. Certain changes that touch on more than one program include: (1) UGI's establishment of a Universal Service Advisory Committee ("USAC") to convene at least twice per calendar year to consist of interested stakeholders, including but not limited to the active parties at this docket, CBOs, and the Commission's Bureau of Consumer Services; and (2) revisions to enrollment and budget projections.

1. The CARES Program

UGI has modified its protection from abuse ("PFA") handling procedures to further ensure the confidentiality of PFA information consistent with the settlement of the UGI Gas base rate proceeding, at Docket Number R-2015-2518438 (Opinion and Order entered October 14, 2016 at ordering paragraph 53). Consistent with the Settlement, any customer who provides UGI with a copy of their PFA order is handled solely by the smaller number of CARES representatives for USP program referrals and payment options.

⁷ October 28th Filing.

⁸ See March 4th Filing.

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2. Operation Share Energy Fund

UGI has made the following changes to the Operation Share Energy Fund:

- Permit the use of Hardship Funds through Operation Share for reconnection fees for income-qualified UGI customers or applicants, regardless of the customer or applicant's prior or current enrollment in CAP.
- Clarification that only the fee payable to CBOs for Hardship Fund-related services is recoverable through the USP Rider.
- In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, for UGI Gas customers, UGI is: (1) expanding eligibility for the Operation Share grant program to 250% FPL; (2) increasing the grant size from \$400 to \$600 to qualifying Gas customers (beginning November 2022); and (3) providing a one-time payment to the Operation Share in the amount of \$500,000 during the winter of 2022-2023.⁹
- In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, for UGI Electric customers, Effective January 1, 2024, the Company will expand eligibility of the Electric Operation Share grant program from 200% FPL to 250% FPL and will increase its annual funding contribution by \$30,000. This will bring UGI Electric's annual funding for Operation Share to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding. Effective January 1, 2024, the Company will also increase the maximum grant size from \$400 to \$600, to the extent funds are available.¹⁰

3. CAP

The 2020-2025 Plan includes the following changes to CAP:

- Customers are permitted to apply and/or recertify for CAP over the phone, with provision of supportive documentation of income eligibility through mail. CBOs are permitted to offer additional means of providing supportive documentation. Those CBOs which offer additional means of communication are indicated in Appendix C of the Plan. In-person appointments with a CBO will remain available to those customers who choose to apply in person.
- To improve customer solicitation for CAP, starting in year 2 of the 2020-2025 USECP, the Companies will provide CAP CBOs with low-income indicated

⁹ October 28th Filing.

¹⁰ March 4th Filing.

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customer lists for direct CAP solicitation. Customers will have the ability to opt-out from provision of their customer information to third parties by a general opt-out option on the customer information system portal.

- The CAP welcome letter for enrolled customers will include the CBO contact information.
- Updated eligibility criteria as follows: (1) permitting customers who operate a business from their residential home to enroll in CAP so long as the business that is being operated from the residential home uses less than fifty percent of the anticipated gas usage served through a single meter; (2) prohibition of CAP for customers using utility service to heat a swimming pool; (3) elimination of the CAP eligibility restriction for customers with balances above \$4,500 who have failed multiple payment arrangements; (4) specification of acceptable forms of identification; (5) clarification of “household income” definition; (6) clarification of terms “fraud” and “theft of service.”
- Clarifications to the CAP application policy and reinstatement policy.
- Introduction of quarterly evaluations of CAP bills.
- Inclusion of Audit Checklist to evaluate CAP CBO performance as Appendix G.
- Specification of new reporting requirement.
- Provision of hypothetical to demonstrate CAP offset calculation.
- UGI Electric has increased its minimum CAP payment from \$25 to \$30 to comport with the Commission’s Policy Statement on Customer Assistance Programs at 52 Pa. Code § 69.265(3)(i)(A)-(C).
- Updated the percent-of-income (“PIP”) calculation in accordance with the CAP Policy Statement Order.¹¹
- Pursuant to Paragraph 48(b) of the 2022 Gas Rate Case Settlement, UGI Gas agreed to continue its outreach to active Gas customers who have been removed from CAP

¹¹ Pursuant to Paragraph 47 of the 2022 Gas Rate Case Settlement, the Company agreed that it would fully comply with the Commission’s Order entered June 16, 2022 in Docket Nos. M-2019-3014966 and P-2020-3019196. To that end, on July 18, 2022, UGI filed its revised 2020-2025 USECP (July 18 Compliance Filing), which revised this USECP to fully comply with the Commission’s June 16, 2022 Order, including the updated PIP’s that appear in Section V.H.1 of this USECP. By Secretarial Letter dated July 25, 2022, the Commission determined that the July 18 Compliance Filing was compliant with the June 16, 2022 Order.

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due to failure to recertify. If these customers submit income documentation, they will be reenrolled, and any arrearage accrued will be included with their existing pre-program arrearages.¹²

- Pursuant to Paragraph 60 (a-b) of the 2023 Electric Base Rate Case Settlement, UGI Electric will:
 - Solicit customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company’s CAP 2 times a year until at least the effective date of the Company’s next USECP.
 - Accept verbal self-reported income eligibility for customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period.¹³

- Pursuant to Paragraph 60 (c-d) of the 2023 Electric Base Rate Case Settlement, UGI Electric will do the following:
 - At such time that the Pennsylvania Department of Human Services (“DHS”) notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, UGI Electric will implement required modifications to its IT system and processes, within a reasonable time frame, such that it may utilize that data to automatically enroll non-shopping LIHEAP recipients into CAP and/or recertify their income and eligibility. Until such time as IT system and process changes are made, the Company will use best efforts to implement manual processing (in the form of an interim pilot discussed below) as soon as practicable, not to exceed three (3) months from the date data is first received.
 - All automatically enrolled LIHEAP recipients will be deemed as being confirmed low income customers eligible for winter shutoff protections.
 - The interim pilot will involve UGI Electric auto-enrolling non-shopping customers who receive LIHEAP into CAP, pending implementation of the auto-enrollment process described in Paragraph 60(c) of the 2023 Electric Base Rate Case Settlement and will contain the following elements:
 - UGI Electric will auto-enroll non-shopping customers who received LIHEAP during the 2022/2023 LIHEAP season and will continue to enroll new LIHEAP recipients during each subsequent LIHEAP season until the time that DHS begins sharing LIHEAP

¹² October 28th Filing.

¹³ March 4th Filing.

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- income participant data with utilities (as described in Paragraph 60(c)).
- Auto-enrolled customers will be placed on CAP under the average bill methodology, unless they provide the Company with proof of income documentation demonstrating qualification for the opportunity to be placed on the lesser of a percent of income (“PIP”) bill or minimum bill amount.
 - Auto-enrolled customers will receive a notification by mail or email as applicable from the Company explaining: (a) the reason for the auto-enrollment; (b) the ability to opt-out of the auto-enrollment; and (c) the opportunity to be placed on the lesser of the CAP minimum bill or PIP bill by providing proof of income.
 - Auto-enrolled customers will be required to recertify their CAP enrollment one year after they are auto-enrolled.
 - Auto-enrolled customers, who are enrolled through the interim pilot and for whom UGI Electric later receives detailed income information from DHS through the data-sharing process identified in Paragraph 60(c), will be transitioned to the best available CAP rate (i.e., PIP, average bill, or minimum bill).
 - Auto-enrolled CAP customers with arrearages less than \$300 at the time of auto-enrollment will be eligible to include their pre-program arrearage (“PPA”) debt forgiveness if they later reenroll in the program.
 - Auto-enrolled customers will be eligible for a one-time payment arrangement (after they leave or are otherwise removed from CAP) on arrears incurred while enrolled in CAP at the average bill rate.¹⁴
- Pursuant to Paragraph 60 (e)(i-v) of the 2023 Electric Base Rate Case Settlement, UGI Electric committed to convene a collaborative with interested stakeholders to identify:
 - The manner and method of outreach and education for auto-enrolled customers to verify income and inform them of program rights and responsibilities.
 - Data points that can be tracked to measure the effectiveness of the pilot program.
 - Associated pilot program action dates related to outreach, education, and auto-enrolment start.
 - During the interim pilot’s term, UGI Electric will provide updates during each USAC meeting regarding the data points identified and agreed upon in the collaborative to determine whether adjustments are needed.
 - The interim pilot will cease operation if and when the terms of Paragraph

¹⁴ March 4th Filing.

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60(c) take effect, regarding when DHS begins sharing LIHEAP participant income data with utilities.¹⁵

4. LIURP

The 2020-2025 Plan includes the following changes to the LIURP program:

- Non heating LIURP customers may be provided an Energy Conservation Kit.
- Updated eligibility criteria as follows: (1) permitting customers who operate a business from their residential home to enroll in LIURP so long as the business that is being operated from the residential home uses less than fifty percent of the anticipated gas usage served through a single meter; (2) prohibition of LIURP for customers using utility service to heat a swimming pool; (3) clarification of “above-average” usage.
- Pursuant to the September 15th Order and Paragraph 44(b) of the 2022 Gas Rate Case Settlement¹⁶, UGI Gas will expand the use of LIURP funds to address the repair or replacement of its residential customers’ inoperable gas furnaces. UGI Gas will increase its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary. Additionally, UGI Gas will set aside \$250,000 annually from its general LIURP budget for furnace repair and replacement projects. For the first two years of the USECP, any unused amounts will roll over to the next year’s budget for furnace repair and replacement projects. Should there continue to be amounts to roll over after two years, any remaining roll over amounts will roll over to UGI Gas’s general LIURP budget up until 2022. Thereafter, per Paragraph 44(a) the 2022 Gas Rate Case Settlement, UGI Gas will increase its general LIURP budget by \$250,000: (1) beginning January 1, 2023; and (2) beginning January 1, 2024. Effective January 1, 2024, the general LIURP budget shall remain unchanged until the Commission approves a change thereto. However, if more than 25% of the general LIURP budget remains unspent on or after January 1, 2025, or in each year thereafter, the Company will take reasonable efforts to spend the funds within the first 6 months of the next year. If, after reasonable efforts are undertaken to spend the unspent funds within the 6 month period, funds still remain, they will not roll forward.¹⁷
- The August 8th Order approved UGI’s petition for waiver of LIURP regulation payback requirement at 52 Pa. Code § 58.11(a) and the LIURP high-use criteria at

¹⁵ March 4th Filing.

¹⁶ Prior to the September 15th Order, UGI Gas had a per-job LIURP funding cap of \$11,000 where furnace replacement was necessary.

¹⁷ October 28th Filing.

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52 Pa. Code § 58.10(a)(1). Paragraph 19 of the August 8th Order provided that these temporary waivers will expire in five years or with the Company's next USECP, whichever is earlier, unless an extension is expressly requested by the Company and granted by the Commission. (August 8th Order, p. 82) Subsequent to the August 8th Order, the Commission extended the term of this USECP to five (5) years. To maintain program continuity, the Company therefore requests that the Commission grant waiver of these regulations until the approval of UGI's next USECP.

- Per Paragraph 44(c) of the 2022 Gas Rate Case Settlement, UGI Gas will expand LIURP access to customers between 151% and 200% of the Federal Poverty Income Guidelines ("FPIG") to commence on January 1, 2023. UGI Gas will provide a Warm Referral¹⁸ for customers in this income tier who are rejected from UGI Gas's Customer Assistance Program ("CAP") for being over-income.¹⁹
- Per Paragraph 44(d) of the 2022 Gas Rate Case Settlement, no later than January 27, 2023, UGI Gas will lower its LIURP minimum usage threshold to 73.1 Ccf per month for customers at or below 200% FPIG.²⁰
- Per Paragraph 59(a) of the 2023 Electric Rate Case Settlement, within 60 days after the final order is entered in that proceeding, which occurred on September 21, 2023, UGI Electric agreed to issue a request for proposal ("RFP") for an additional LIURP resource, including CBOs in UGI Electric's service territory, capable of performing 20 additional baseload and 10 additional heating jobs annually.²¹
- Per Paragraph 59(b) of the 2023 Electric Rate Case Settlement, effective January 1, 2024, UGI Electric will lower its Electric LIURP heating and baseload job access to customers between 151% and 200% FPL; a limit of 20% of the overall LIURP budget shall apply for jobs related to customers falling between 151% and 200% FPL.²²

C. NEEDS ASSESSMENT

As required by 52 Pa. Code § 62.4(b)(3), at the time of initial filing, UGI South and UGI North rate districts submitted a needs assessment in Appendix B of this Plan. The needs assessment is based on 2010 census data and 2015 UGI Gas records. Pursuant to 52 Pa. Code §§

¹⁸ A Warm referral automatically refers these customers to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). The Company proactively determines if these customers qualify for benefits under these other programs without any need by the customer to apply for the benefits.

¹⁹ October 28th Filing.

²⁰ October 28th Filing.

²¹ Per the September 21, 2023 Order, [a]ll associated incremental costs shall be recoverable as expanded through Rider USP as LIURP costs.

²² March 4th Filing.

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54.77 and 62.7, EDCs and NGDCs with less than 100,000 residential customers are not required to submit a needs assessment; therefore, UGI Electric and the former UGI Central rate district did not submit a needs assessment. Future USECPs will provide needs assessments on a combined basis for UGI Gas.

III. THE CARES PROGRAM

A. DESCRIPTION OF THE CARES PROGRAM

1. Goals and Objectives

The goal of the CARES Program is to provide personal assistance and referrals to payment-troubled customers and to help improve their delinquent bill payment problems. The CARES Program identifies special needs customers and guides them to the appropriate program or agency. CARES concentrates on, but is not exclusively for, the low-income segment that may lack the knowledge of energy conservation, budget counseling and fuel assistance programs. Unlike other USPs administered by UGI, the CARES Program is geared toward the customer who has a temporary, immediate need, such as loss of income, loss of head of household, illness or any other temporary situation resulting in an inability to pay. CARES is intended to be a short-term assistance referral program to guide a customer through a difficult time and to help inform and educate them about the available assistance. The CARES Program also provides extensive LIHEAP outreach to help increase awareness of the program and encourage all eligible households to apply for grants. Specifically, all customers who provide UGI with a copy of their PFA order are handled by CARES representatives for specific program referrals and payment options.

2. Program Design

The CARES Program was developed as an outreach and referral service to assist customers with special hardships. CARES is available to any residential customer who is confronted with a temporary hardship that could result in the loss of utility service. Assistance is obtained through UGI's programs and the established network of social agencies. CARES is designed to help a select group of customers with special circumstances, which may include, among other things, the need for help in paying their utility bill or assistance from a social agency. UGI offers information, guidance and referrals to obtain energy assistance and other social help programs from the Customer Outreach Department. Each CARES customer may receive an informational mailing. The mailing contains educational material on each of the assistance programs and any other referral information that may be helpful to the customer.

At appropriate times of the year, eligible CARES customers receive information on additional Customer Outreach programs, such as LIHEAP, LIURP, CAP, and the Operation Share Energy Fund.

B. FUNDING AND BUDGET

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See Appendix A for the UGI's budgets for the CARES program.

C. ELIGIBILITY CRITERIA

Any residential customer with a delinquent balance or a negative ability-to-pay and special circumstance may be eligible for CARES. For example, recent unemployment, disability, loss of head of household, inability to understand their bill, temporary illness or need for senior citizen assistance, would render a customer eligible for CARES.

D. INTAKE / NETWORKING

Customer Outreach employees maintain contact with CBOs through referrals and educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers in energy conservation and to increase public awareness of the various CARES Program services. Presentations are made throughout the service territory and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues.

IV. THE OPERATION SHARE ENERGY FUND

A. PURPOSE & OBJECTIVES

A number of causes, foreseen and unforeseen, could potentially affect the ability of customers to pay their bills. UGI's hardship fund – Operation Share Energy Fund – has been formed for the purpose of providing assistance to residential customers faced with a hardship in paying their energy bill due to an unforeseen situation. To achieve its purpose, the Operation Share Energy Fund includes the following objectives:

- to provide customers, employees and the public an opportunity to contribute money to help their less fortunate neighbors who are unable to pay their energy bills due to unforeseen circumstances;
- to give financial assistance to current customers that have fixed or low incomes, are unemployed, disabled or faced with some catastrophic event or crisis situation;
- to provide additional funds and support to community organizations that are dedicated to this same purpose.

For the 2020-2025 USECP, UGI will be permitted to use hardship funds to pay for reconnection fees for customers or applicants who are income qualified for the program, regardless of the customer or applicant's prior or current enrollment in CAP.

B. FUNDING AND BUDGET

Operation Share funding will be used to make voucher payments directly to residential

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customers declared eligible by the designated administering agency, less amounts used for administrative expenses. UGI matches the total contributions made by customers, employees or outside sources to Operation Share each year. No matching funds are made available to match public, tax-supported sources, such as LIHEAP, however. Employees of UGI are encouraged to make a donation directly to Operation Share. Additional fundraising events may be organized in each of UGI's service territories. It is intended that an appeal will be made at least twice during the year to all of UGI's customers, via a billing insert, to make a contribution to Operation Share. The insert describes Operation Share and requests support with a check for any amount.

See **Appendix A** for UGI's funding for the hardship fund.

C. ADMINISTRATION

The Operation Share program is administered by UGI's USP Staff using the Customer Outreach System ("COS"). The COS provides customer information, such as eligibility criteria, account balance, recent bills and payments. UGI contracts with CBOs that have the ability to process grants using web-based applications, which then use the account information from the COS to determine the amount of grant awarded to the customer. The COS also maintains the financial aspects of the program.

A specific role is established in the COS for the representative that has the final authority to approve or deny assistance for a customer. This designated person is responsible for the Operation funds assigned to a CBO. UGI's personnel will not participate in the determination of grants, other than to refer applicants to the CBO for consideration.²³

Operation Share Energy Fund is designated as a public charity under section 501(c)(3) of the Internal Revenue Code. All donations from customers, employees, and outside sources are kept in a separate Operation Share bank account and passed directly to the participating agencies to permit them to make direct payments to energy vendors for those applicants who qualify.

D. ELIGIBILITY

The guidelines for grants from Operation Share allow for administrative flexibility in providing assistance. In order to assure fair treatment of all applicants, however, the following guidelines must be followed (unless UGI or the CBOs agree to waive or modify a guideline in extraordinary circumstances):

- the customer must have a residential account with UGI and the customer's premise is the customer's primary residence;
- the customer must have an active heating or non-heating utility account;

²³ There are some occasions where personnel will approve Operation Share on a customer's behalf, for example, in the instance of a legislative request to supplement LIHEAP grants.

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- the customer must not have received an Operation Share grant in the last 12 months;
- the customer must have an outstanding balance on their utility bill;
- the maximum income of a gas customer’s household must be at or below the current federal poverty income guidelines (“FPIG”) of 250%;²⁴
- pursuant to Paragraph 58 of the 2023 Electric Rate Case Settlement, effective January 1, 2024, the Company will expand eligibility of the Electric Operation Share grant program from 200% FPIG to 250% FPIG;²⁵
- the customer must provide adequate information to demonstrate inability to pay energy bills;²⁶
- customers for Operation Share with delinquent balances must first contact the Credit Department to discuss their options; and
- an active participant in the CAP is not eligible for Operation Share assistance.

Residential accounts with the following indicators are not eligible for this program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- theft of service; and
- Landlord if Shut-off (“LIFSO”) agreement (account is in the owner's name).

In order to assure fair treatment of all customers, the following amounts represent the maximum grant to be awarded per eligible customer in each of UGI’s divisions and rate districts.

| Division | Maximum Amount |
|-----------------|-----------------------|
| UGI Gas | \$600 ²⁷ |
| UGI Electric | \$600 ²⁸ |

²⁴ October 28th Filing.

²⁵ March 4th Filing.

²⁶ Necessary information includes evidence of income of all members of the household. In addition, the applicant will authorize the CBO (verbally or written) to obtain account history information from their energy vendor. There is no requirement that each household member must verify household expenses as part of the Operation Share application process.

²⁷ In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, UGI Gas increased the grant size from \$400 to \$600 to qualifying Gas customers.

²⁸ In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, UGI Electric increased the grant size from \$400 to \$600 to qualifying Electric customers.

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Exceptions to the maximum grant amount may be approved for special circumstance customers.

E. PAYMENT OF GRANTS

The designated CBO is granted a maximum amount against which vouchers can be written. So long as the CBO's maximum amount is not exceeded, a voucher may be written and will be honored by UGI for the payment of the applicant's bill.

All cash funds must be retained by the CBO in its Operation Share account and payments from this account shall only be made to UGI. Under no circumstances will any payments be made directly to a customer. In accordance with Paragraph 49 of the 2022 Gas Rate Settlement, UGI Gas is providing a one-time payment to the Operation Share in the amount of \$500,000 during the winter of 2022-2023. In accordance with Paragraph 58 of the 2023 Electric Rate Case Settlement, on January 1, 2024, UGI Electric increased its annual Operation Share funding in the amount of \$30,000, bringing the annual funding to a total of \$117,423 for 2024 and each year thereafter until a change in hardship fund contribution levels is otherwise ordered in a subsequent proceeding.²⁹

V. CUSTOMER ASSISTANCE PROGRAM

A. INTRODUCTION

CAP provides all eligible low-income, payment-troubled residential customers that reside in the rate districts of UGI a more affordable way to pay their natural gas or electric bill. Each month, CAP participants are billed an equal CAP payment amount based on the participant's gross income or average bill,³⁰ depending on which option provides the most affordable monthly CAP payment.

In this 2020-2025 USECP, UGI will continue the practice instituted in the previous 2014-2017 USECP to place no limit on CAP enrollment or set a maximum CAP credit per customer.

B. INTAKE/NETWORKING/EDUCATION

Customer Outreach employees maintain contact with CBOs through referrals and educational services. Upon request, employees organize and/or conduct community meetings and workshops to educate customers of the benefits of CAP. Presentations are made throughout the service territory and brochures and literature are distributed to communicate the social services that are available to customers. Employees maintain communication with appropriate professional and local organizations to strengthen skills and remain current on local issues. UGI will work

²⁹ March 4th Filing.

³⁰ A customer's average bill will be determined based upon twelve-months of historical usage for the residence or, if usage data is not available for the residence, the customer's average bill will be set using the average bill for all residential customers.

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with its USAC to explore opportunities to provide consistent consumer education to CAP customers during their participation in CAP.

C. FUNDING AND BUDGET

See Appendix A for a more detailed description of CAP funding.

D. ADMINISTERING AGENCIES

CAP is administered by a variety of CBOs, listed in Appendix C of this Plan (the “CAP CBOs”) that are overseen by UGI’s Manager, Universal Services.³¹

With the help of the COS, the CAP CBOs are responsible for taking the following steps to enroll customers in the CAP³²:

- verify the application is complete and consent has been obtained;
- properly complete the CAP enrollment;³³
- verify eligibility, proof of identification, proof of income and family size;
- assist applicant to properly complete LIHEAP and other grant applications;
- fully explain the program benefits and responsibilities to the customer;
- discuss the payment amount, based on guidelines provided by UGI; and
- inform applicants in writing of missing information along with steps the applicant can follow to provide that information.
- confirm customer’s acceptance in the program.
- inform applicants in writing if CAP application is denied along with steps the applicant can follow to contest denial.

The CAP CBOs will provide customer education in the areas of:

- usage reduction education consistent with that outlined in LIURP below;
- low cost/no cost energy conservation tips;
- basic household budget counseling; and
- related items specific to the individual applicant’s needs, including providing an energy

³¹ Prior to March 2022, the former Customer Outreach Senior Supervisor position oversaw the CAP CBOs.

³² UGI’s USP Staff also enroll eligible customers into the CAP program.

³³ The CAP enrollment process will include application completion via telephone or mail when an in person visit is not required or feasible.

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education session for customers who historically have an above average usage.³⁴

The CAP CBOs are responsible for: (1) referring participants to any other assistance, social, or governmental programs that may provide help for any other present needs; (2) monitoring each account monthly based on UGI's prompted tasks on the COS, such as past due phone calls and recertification; and (3) providing energy education sessions to above average usage customers (i.e. customers exceeding the CAP usage criteria in Table 4).

Finally, while the CAP Administering Agencies will be responsible for processing the annual recertification of all requirements, UGI itself will process appeals for reconsideration from participants removed from CAP within 30 days.

Two changes in this 2020-2025 USECP, previously mentioned, are (1) the allowance of alternate means of communication for CAP enrollment and recertification; and (2) the expanded ability of CAP CBOs to directly solicit low-income indicated customers of the UGI Companies.

Alternative Means of Communication for CAP Enrollment and Recertification

UGI will allow customers and applicants for service to apply and/or recertify for CAP over the phone, with provision of supportive documentation through mail or other means (including but not limited to fax, email, or text messaging) that are reasonably available to the Company's CBO serving that portion of UGI's service territory. Once the CBO has verified that all of the documentation is received and accurate, the Company will send a Welcome Letter to the applicant, which will: (1) confirm that the applicant has been approved for CAP; (2) provide the applicable CBO contact information; and (3) explain that at any time the customer may unenroll from CAP. In-person appointments with a CBO will remain available to those individuals who choose to apply in person. The available means of communication for each CBO is indicated on **Appendix C**.

Direct Solicitation

In year 2 of this USECP, UGI will provide CBOs with low-income customer lists for direct CAP solicitation.³⁵ To maintain customer privacy and respect customer preference, customers will have an option to opt-out from provision of their information to third-parties by a general opt-out option on the Customer Information System ("CIS") and through information on bill inserts.

Pursuant to Paragraph 60(a) of the 2023 Electric Rate Case Settlement, UGI Electric will solicit customers who self-reported Level 1 income in the prior 12 months for enrollment in the Company's CAP 2 times a year until at least the effective date of the Company's next Universal Service and Energy Conservation Plan ("USECP").³⁶ Beginning in 2024, the solicitations will

³⁴ The UGI Companies will monitor CAP customer usage and implement controls to avoid excessive CAP customer usage.

³⁵ UGI will implement the direct solicitation of CAP customers by CBOs in year 2 of the USECP to ensure that any programming required for this programmatic change is completed prior.

³⁶ March 4th Filing.

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occur in spring (May-June) and winter (November).

E. MONITORING

UGI will provide routine information and metrics to the CAP CBO pertaining to the performance of the administration of the program. In addition, UGI will make routine visits to the agencies and will also conduct annual training updates for CAP caseworkers. Further, UGI will audit agency performance by reviewing enrollments, re-certifications, and completed tasks. The audit will include confirmation that the appropriate paperwork is signed and when required, income verification and customer identification were obtained. The COS will maintain specific agency statistics such as: number of program participants; percentage of CAP customers that are past due; and an active list of customers that require re-certification. UGI's audit checklist is outlined in **Appendix G**.

F. EVALUATION

As required by the Commission's regulations, 52 Pa. Code § 62.6, both a program process evaluation and impact evaluation were performed in 2012 by an independent, third party evaluator (APPRISE), which provided a report of findings addressing the following areas:

- program design;
- administrative costs;
- program costs;
- payment behavior;
- consumption habits; and
- energy assistance participation.

UGI considered the recommendations of the APPRISE report in reviewing and preparing this 2020-2025 USECP. By Order entered on October 3, 2019 at Docket No. M-2019-3012601, the Commission granted temporary partial limited waivers of 52 Pa. Code §§ 54.74, 54.76 (a-b), 62.4, and 62.6 (a-b) to natural gas and electric distribution companies for the purposes of adhering to the 2020-2025 universal service and energy conservation plan and universal services impact evaluation filing schedule provided therein. UGI's next USECP evaluation report will be filed with the Commission by April 1, 2024 as provided in the October 3rd Order.

G. CUSTOMER ELIGIBILITY REQUIREMENTS

To be eligible for CAP, customers may be referred by UGI or CAP CBOs. To be eligible, a customer must: (1) complete the CAP application and have gross household income verified at 150 percent of poverty or less;³⁷ (2) be a residential heating or non-heating customer with active energy service from UGI; and (3) if a previous participant, a review will be completed to assure the reason for the prior default has been cured or the customer has been out of the program for a

³⁷ A customer with no income will be eligible to participate in CAP and be responsible to make the minimum monthly CAP payment.

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minimum of 12 months for a voluntary removal. Pursuant to Paragraph 44(c) of the 2022 Gas Rate Case Settlement, and beginning on January 1, 2023, Gas customers between 151% and 200% FPIG, who are rejected from CAP as being over-income, will receive a Warm referral. A Warm referral automatically refers these customers to other low-income programs that may assist the customer (e.g., LIURP, Operation Share Grant, CARES). The Company proactively determines if these customers qualify for benefits under these other programs without any need for the customer to apply for benefits. Benefits to qualifying customers include weatherization measures at residences and/or energy assistance grants for heating bills.

Pursuant to Paragraph 60 (c-d) of the 2023 Electric Base Rate Case Settlement, UGI Electric will do the following:

- (c) At such time that the Pennsylvania DHS notifies the LIHEAP Advisory Committee that it is ready to share LIHEAP participant income data with utilities, currently anticipated to begin in Fall 2024, UGI Electric will implement required modifications to its IT system and processes, within a reasonable time frame, such that it may utilize that data to automatically enroll non-shopping LIHEAP recipients into CAP and/or recertify their income and eligibility. Until such time as IT system and process changes are made, the Company will use best efforts to implement manual processing (in the form of an interim pilot discussed below) as soon as practicable, not to exceed three (3) months from the date data is first received. All automatically enrolled LIHEAP recipients will be deemed as being confirmed low income customers eligible for winter shutoff protections.³⁸
- (d) The interim pilot will involve UGI Electric auto-enrolling non-shopping customers who receive LIHEAP into CAP, pending implementation of the auto-enrollment process described in Paragraph 60(c) of the 2023 Electric Base Rate Case Settlement and will contain the following elements:
 - i. UGI Electric will auto-enroll non-shopping customers who received LIHEAP during the 2022/2023 LIHEAP season and will continue to enroll new LIHEAP recipients during each subsequent LIHEAP season until the time that DHS begins sharing LIHEAP income participant data with utilities (as described in Paragraph 60(c)).
 - ii. Auto-enrolled customers will be placed on CAP under the average bill methodology, unless they provide the Company with proof of income documentation demonstrating qualification for the opportunity to be placed on the lesser of a percent of income (“PIP”) bill or minimum bill amount.
 - iii. Auto-enrolled customers will receive a notification by mail or email as applicable from the Company explaining: (a) the reason for the auto-enrollment; (b) the ability to opt-out of the auto-enrollment; and (c) the opportunity to be placed on the lesser of the CAP minimum bill or PIP bill by providing proof of

³⁸ March 4th Filing.

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- income.
- iv. Auto-enrolled customers will be required to recertify their CAP enrollment one year after they are auto-enrolled.
 - v. Auto-enrolled customers, who are enrolled through the interim pilot and for whom UGI Electric later receives detailed income information from DHS through the data-sharing process identified in Paragraph 60(c), will be transitioned to the best available CAP rate (i.e., PIP, average bill, or minimum bill).
 - vi. Auto-enrolled CAP customers with arrearages less than \$300 at the time of auto-enrollment will be eligible to include their pre- program arrearage (“PPA”) debt forgiveness if they later reenroll in the program.
 - vii. Auto-enrolled customers will be eligible for a one-time payment arrangement (after they leave or are otherwise removed from CAP) on arrears incurred while enrolled in CAP at the average bill rate.³⁹
- (e) Pursuant to Paragraph 60 (e)(i-v) of the 2023 Electric Base Rate Case Settlement, UGI Electric committed to convene a collaborative⁴⁰ with interested stakeholders to identify:
- i. The manner and method of outreach and education for auto-enrolled customers to verify income and inform them of program rights and responsibilities.
 - ii. Data points that can be tracked to measure the effectiveness of the pilot program.
 - iii. Associated pilot program action dates related to outreach, education, and auto-enrollment start.
 - iv. During the interim pilot’s term, UGI Electric will provide updates during each USAC meeting regarding the data points identified and agreed upon in the collaborative to determine whether adjustments are needed.
 - v. The interim pilot will cease operation if and when the terms of Paragraph 60(c) take effect, regarding when DHS begins sharing LIHEAP participant income data with utilities.⁴¹

An applicant’s Social Security Number (SSN) is requested in the CAP application as a form of customer identification but is not required for enrollment into the program. UGI will accept Individual Tax Identification Numbers (“ITIN”) in lieu of the applicant’s SSN. For those applicants who do not provide either an SSN or ITIN, UGI will waive this requirement provided that the customer provides two other acceptable forms of identification. Acceptable forms are:

1. One government issued photo identification such as:

³⁹ March 4th Filing

⁴⁰ UGI Electric convened the stakeholder collaborative on October 18, 2023.

⁴¹ March 4th Filing.

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- Driver's License
 - Passport
 - Military ID card
 - ID cards issued by Federal State or Local Government or;
 - Any valid foreign government ID
2. Two alternative forms of identification if a government issued photo identification is not available, such as:
- College student ID card
 - Social security card
 - Voter registration card
 - Birth Certificate
 - U.S. Citizen ID card/ Permanent Resident Card
 - Native American Tribal Card
 - ITIN (individual Taxpayer Identification Number)

All forms of identification must be valid and not expired.

Residential accounts with the following indicators are ineligible for CAP or will be removed from CAP:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- theft of service;
- LIFSO agreement (account is in the owner's name);
- choice customers;
- utility service used to operate a swimming pool;
- a residential property where more than fifty percent of the anticipated usage served through a single meter is used to operate a business.

UGI further reserves the right to deny enrollment if the customer is deemed to lack good faith, honesty or fair dealing while working with the CAP CBO or UGI during the application process or if the customer fails to engage in good faith efforts to conserve energy. Demonstration of lack of good faith honesty and fair dealing may be evidenced by fraud or theft of service. The Company defines "fraud" as the intentional misrepresentation of CAP eligibility criteria. "Theft

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of Service” occurs when a person obtains utility service by deception, tampering with Company facilities, or other means designed to avoid payment for utility service provided by the Company. The two most common examples of theft of service are: (1) a customer’s physical bypass of a meter so that all energy usage is not recorded; and (2) the magnetic tampering of a meter to impede the registration of usage. However, this list is not conclusive and other instances of theft may arise that results in a customer’s disqualification from CAP.

Upon request, subject to the recertification process, a CAP participant must provide evidence of continued program eligibility, which he/she may do so via the communication means indicated on **Appendix C**.

If a CAP participant changes residences, the following conditions will apply and be communicated to the customer: (1) as long as all eligibility requirements and other terms and conditions continue to be met, the participant may remain eligible to participate in CAP; and (2) so long as the participant remains enrolled in the program, no late payment charges will be imposed.

An applicant determined ineligible would receive written notification specifying the reason(s) for ineligibility. If the applicant is not satisfied with the determination of eligibility, the Company will use utility company dispute procedures in accordance with Chapter 56.151 and 56.152. The applicant may also appeal the denial of eligibility to the Bureau of Consumer Services in accordance with 52 Pa. Code §§ 56.162-56.166, relating to informal complaint procedures and may pursue a formal complaint against the Company. Notice of right to appeal will be provided with the written notification of ineligibility.

H. MONTHLY CAP PAYMENT AMOUNT

1. Determination of Monthly CAP Payment Amount

The amount to be paid by a CAP customer each month will be based on the lower of the percentage of the customer's monthly income, as described below, or the customer’s otherwise applicable average monthly bill.⁴² To determine the customer’s monthly CAP payment amount based on the percentage of the customer’s income, the customer’s monthly income is compared to the FPIG, and the payment amount is set based on the following guidelines:

Electric and Natural Gas Non-Heating Customers⁴³

| Household Income as Percent of FPIG | Monthly CAP Payment |
|--|------------------------------------|
| 0-50% | 2% of Participant’s Monthly Income |

⁴² Exceptions to the payment schedule and grant application practice will be made based on individual needs.

⁴³ The original footnote 12 was deleted when the Monthly CAP payments were updated on July 18, 2022.

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| | |
|----------|------------------------------------|
| 51-100% | 4% of Participant's Monthly Income |
| 101-150% | 4% of Participant's Monthly Income |

Natural Gas Heating Customers⁴⁴

| Household Income as Percent of FPIG | Monthly CAP Payment |
|-------------------------------------|------------------------------------|
| 0-50% | 4% of Participant's Monthly Income |
| 51-100% | 6% of Participant's Monthly Income |
| 101-150% | 6% of Participant's Monthly Income |

Electric Heating Customers

| Household Income as Percent of FPIG | Monthly CAP Payment |
|-------------------------------------|------------------------------------|
| 0-50% | 6% of Participant's Monthly Income |
| 51-100% | 8% of Participant's Monthly Income |
| 101-150% | 9% of Participant's Monthly Income |

Both gas and electric customers with no income will be responsible to make the minimum monthly CAP Payment.

If a customer's monthly CAP payment amount as a percentage of the customer's monthly income, as calculated above, exceeds the customer's otherwise applicable average bill amount, the customer's average bill will be set as the customer's monthly CAP payment amount.

At any time during the program should a participant's monthly income change, the monthly CAP payment amount will also be reviewed and changed, where appropriate. It is the customer's obligation to notify the company or the CAP Administering Agency of the change in income. UGI reserves the right to require that the customer provide proof of the change in income. A recertification will be processed using the updated income and historical usage to determine the new monthly CAP payment amount.

Additionally, the participant's monthly CAP bill will be reevaluated quarterly, to ensure that the participant is actively on the most affordable billing option. For example, if the customer entered into CAP with a percent-of-income plan, and upon a quarterly review, the customer's average bill is deemed to be the most affordable at the time of the review, the customer's new CAP will be based on their average bill until the next review.

UGI's minimum monthly CAP payment is within the suggested range set forth in the

⁴⁴ The original footnote 13 was deleted when the Monthly CAP payments were updated on July 18, 2022.

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Commission's Policy Statement on Customer Assistance Programs at 52 Pa. Code § 69.265(3)(i)(A)-(C). The CAP payment for gas heating accounts is set at \$25, non-heating accounts at \$15, and electric heating accounts at \$30.

2. Household Income Documents

To determine CAP eligibility and the appropriate CAP monthly payment, proof of income at or below 150% of FPIG must be provided by the customer to the Company. However, for customers receiving LIHEAP, who have already been determined to have income under 150% of the FPIG by DHS, the Company will accept self-certification of income level for the purpose of calculating the customer's monthly payment and no documentation of income is required for such customers. Moreover, pursuant to Paragraph 60(b) of the 2023 Electric Rate Case Settlement, on December 1, 2023, UGI Electric began accepting verbal self-reported income eligibility for Electric customers at or below 250% of the FPL during the Winter Moratorium for purposes of winter shutoff protections, requests for deferred payment arrangements, or any other customer contact with the call center for an unpaid bill. Normal income verification requirements maintained by the Company shall apply upon the end of the Winter Moratorium period.⁴⁵

Acceptable income documents are:

- Recent paystubs or W-2 forms
- Verified copy of rent receipts for rental income
- Benefit letter or copy of bank statement for;
 - Social security
 - Pension
 - Disability
 - SSI
- Verification Letter
 - alimony support
- Unemployment determination letter
- Notarized letter stating income
- Zero income form

Additional Notes:

- Interest does not need to be counted as income.
- UGI does not include income earned from an occupant under the age of 18, nor does it include income received for the benefit of a minor, in its calculation of household income.

⁴⁵ March 4th Filing.

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3. Use of LIHEAP Grants

LIHEAP grants received will be applied consistent with the Commonwealth of Pennsylvania's Low-Income Home Energy Assistance Program – Final State Plan (“Final State Plan”), and any subsequent amendments or changes thereto.

4. Late Fees & Security Deposits

While actively participating in the program, late payment charges will not be imposed on CAP customers. Security deposits are also not imposed on CAP customers.

I. PARTICIPANT OBLIGATIONS

In order to remain eligible for participation in CAP, a customer must agree to (in writing) and perform the following obligations:

- make the monthly CAP payments;
- apply for and direct to UGI the customer's LIHEAP Cash or Crisis grant;
- conserve energy and, if eligible, participate in LIURP and any other weatherization services offered through local and state weatherization agencies (unless residence was previously weatherized under these programs);
- provide access to the meter for an actual meter reading, if required;⁴⁶
- participate in good faith and comply with all educational, assistance, social or governmental programs recommended by the Company or by the CBO;
- report immediately to the CBO any change in family size, or change in income;
- comply with the recertification requirements; and
- apply for any assistance grant for which he/she may be eligible.

In order to assure fair treatment of all participants, however, UGI will administer the aforementioned obligations with sufficient flexibility to provide the assistance intended by the program. Therefore, UGI or CAP CBOs may agree to waive or modify one or more of the participant obligations in extraordinary circumstances.

⁴⁶ CAP Credit and Pre-Program Arrearage forgiveness may be held up if an actual meter reading is not available.

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J. PRE-PROGRAM ARREARAGE FORGIVENESS

UGI forgives a CAP customer's pre-program arrearage balance on a one thirty-sixth (1/36th) basis upon receipt of each timely and in-full CAP monthly payment. This practice provides immediate incentive for a CAP customer to continue the positive payment behavior. UGI also provides no less than a \$10.00 per month pre-program arrearage forgiveness. UGI applies arrearage forgiveness for each timely and in-full monthly payment, regardless of arrears, and retroactively for any months missed once those months are paid. For example, if a CAP customer is delinquent for three months of payments, and makes catch-up payments for two of those three months, the customer will receive forgiveness for those two months.

To be eligible for pre-program arrearage forgiveness, participants must maintain all program requirements in each month since enrolling in the program.

K. APPLICATION OF CAP CREDITS

Pursuant the Commission's regulations, at 52 Pa. Code § 62.2, and UGI's effective tariffs, a CAP credit is set as the difference between the CAP customer's actual usage bill calculated at the standard residential rate and the CAP monthly bill. UGI applies CAP credits on a monthly basis with each full CAP payment received. Any CAP credits associated with missed CAP payments will be applied once the customer brings their payments up to date.

UGI eliminated its per-customer maximum CAP credit in its 2014-2017 USECP. UGI's 2020-2025 USECP will likewise not have a per-person CAP credit maximum.

UGI institutes the following CAP control features to encourage energy conservation:

High Annual Usage at Enrollment: UGI uses the following thresholds to determine when a customer is considered to be a high usage customer. These thresholds were determined by analyzing the current population of customers and their usage information and determining a 95% confidence level.

| Division | High Usage |
|-----------------|-------------------|
| UGI Gas | 2,356 ccf |
| UGI Electric | 34,465 kwh |

Any customer that applies for CAP, and any existing CAP customer with usage above these assigned thresholds, will:

- Participate in an interview with the CAP caseworker. The CAP caseworker will review data specific to the customer's residence to determine potential reasons for the customer's high usage.
- The CAP caseworker will then conduct an energy education session.

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- If applicable, referrals will be made for the LIURP program.
- If enrolled, high usage will continue to be monitored for additional outreach and referrals.

This high-usage evaluation will take place annually for existing CAP customers.

Removal from CAP

1. A CAP customer may be removed from CAP for refusing to participate in the LIURP program.
2. A customer may be removed for failure to comply with these high usage controls.⁴⁷

L. RECERTIFICATION POLICY

1. CAP Recertification Requirements for LIHEAP and Non-LIHEAP Participants

Participants must provide evidence of continued program eligibility. The recertification process is a mandatory requirement in order to ensure proper participation and continued program eligibility.

UGI has a triennial recertification requirement for known LIHEAP participants. CAP customers who are not known LIHEAP participants are required to recertify for CAP annually. A customer will not be deemed ineligible for CAP on the basis of failure to participate in LIHEAP. Non-LIHEAP CAP customers who recertify annually for CAP will remain enrolled in CAP. To recertify, participants must provide:

- For LIHEAP Participants - When the LIHEAP income guidelines are the same as CAP; LIHEAP participants who have received a LIHEAP Cash or Crisis grant within the last 12 months will only be required to provide income documentation every three years to UGI.⁴⁸
- For Non-LIHEAP Participants - Income documentation must be provided annually to verify that the participant's household income is at or below the current 150% of the FPIG.

Should the participant fail or refuse to recertify within two billing cycles of being notified to do so, UGI may remove the customer from CAP. UGI believes this practice encourages those participants who continue to have household incomes at or below 150% to complete the

⁴⁷ Exceptions may be granted where the factors giving rise to the customer's increased consumption are beyond the customer's reasonable control.

⁴⁸ Historically the income criteria for CAP has matched that for LIHEAP. Should the LIHEAP and CAP income requirements differ, UGI will notify the LIHEAP-participating CAP customer of the responsibility to recertify on an annual basis.

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recertification process and, therefore, maintain affordable energy bills. The customer is responsible to reenroll in the program.

2. Recertification Reminder Schedule

The Companies actively remind CAP participants of their obligation to recertify income eligibility as per the following schedule:⁴⁹

- A recertification notice letter is mailed a month prior to the anniversary date (recertification due date);
- A contact from the CBO is made 15 days prior to the anniversary date;
- A reminder letter is mailed from the Company on the anniversary or on the recertification due date; and
- A contact from the CBO is made 1 month past the anniversary date.

3. Use of Zero Income Statements for CAP Enrollment and Recertification

UGI customers who report zero household income at the time of CAP enrollment and recertification are required to complete a “Zero Income Form,” as set forth in Appendix F. The Zero Income Form need not be notarized. The Zero Income Form must be filled out by the individual who holds the account with UGI. The following information is required: (1) customer name; (2) date of application; (3) account number; (4) service address; (5) a list of adult household members with zero income; and (6) an explanation of how household expenses were met for food and shelter during the applicable period. The Zero Income Form must be signed by both the account holder and a CAP CBO representative. As stated on the form, by signing the Zero Income Form, the customer provides consent to UGI to verify income with government agencies. UGI CBOs have reported that use of the form does not hinder participation in the UGI universal service programs and therefore UGI will continue to use the Zero income form without modification.

As outlined in the participant obligations customers are to immediately report a change in household size or income. Specifically, for a customer who reports zero income, UGI will require the customer update their income (if they have not already done so) six months following the report of zero income.

4. Impact of Recertification

Appropriate changes in the percentage of income and/or average bill payment will be made upon completion of the recertification process. If income or average bill payment at the time of recertification dictates a change in the monthly payment, the new amount will be used for future monthly payments. Future bills issued upon completion of recertification will reflect an appropriate CAP bill amount but past CAP bills issued are the customer’s responsibility to pay.

⁴⁹ See Appendix E for a schematic of the Companies’ recertification process.

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During the recertification process, if a participant is deemed ineligible for continued participation in CAP, the customer will be notified that they are no longer eligible to participate and the reason(s) why they are no longer eligible for CAP.

M. REASONS FOR REMOVAL FROM CAP

- Failure to make CAP payments that results in termination and the customer has not cured his/her payments within 109 days of termination.
- failure to comply with any customer obligation set forth in the program;
- failure to comply with the obligation of good faith, honesty and fair dealing while working with the CAP CBO or UGI;
- household income increases to greater than 150% poverty;
- failure to comply with established high usage controls;⁵⁰
- refusal to participate in LIURP;
- any reason for which the customer's service may be terminated under Chapter 56 or Chapter 14;
- failure/refusal to recertify in CAP;
- bankruptcy - at the time of the filing of bankruptcy all receivable amounts which may include frozen pre-program arrearage will fall under the jurisdiction of the bankruptcy court and will no longer be eligible for CAP benefits; and
- legal action - should UGI have reason to take legal action against a participant that encompasses any receivable owed it, all receivable amounts which may include pre-program arrearages will fall under the jurisdiction of the applicable court and will no longer be eligible for CAP benefits. Participants removed from the CAP will receive a written statement indicating the reason(s) for the dismissal. Customers defaulting and dropped from the CAP will be referred to the Company's Credit and Collection Department for further action, if necessary.

Any CAP participant may voluntarily request to be removed from the program. However, if a CAP participant requests to be removed from CAP for the reason that their seasonal usage bills total less than the monthly CAP amount (“seasonal short-term benefit”), the customer will be removed from the program and will forfeit all program benefits. The customer will then be required to remain out of CAP for a period of twelve months before they can re-apply for the program, provided exceptions will be granted on a case-by-case basis based on demonstrated hardship. The customer will be mailed a letter to confirm his request to be voluntarily removed

⁵⁰ Exceptions may be granted where the factors giving rise to the customer’s increased consumption are beyond the customer’s reasonable control.

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from CAP. UGI will accept the request for removal via phone with a UGI representative.

UGI removes customers when service is voluntarily discontinued by the customer and the CAP participant is no longer a customer. All unpaid bills and unforgiven dollars are due upon the removal from CAP as this is considered a broken payment arrangement.

UGI also reserves the right to remove any CAP customer if the program is deemed non-beneficial without having to receive the customer's consent.

N. CAP NON-PAYMENT DEFAULT AND CREDIT AND COLLECTION POLICIES

Customers who miss a CAP payment are provided two payment notifications prior to the Company initiating its termination procedures. After the customer's first missed payment, assuming the payment has not been made, the CAP CBO sends a notification to the customer at 15 days and 25 days after the missed payment. The 15-day notification may be a letter or telephone call. The 25-day notification is a mailed letter. Both the 15- and 25-day notifications advise the customer that their CAP payment is overdue.

Upon the customer's second missed CAP payment, UGI moves forward with the appropriate notifications and shut-off procedure and will send a termination notice stating the past-due amount. The customer will be required to pay the amount set forth in the termination notice, prior to the scheduled termination date to avoid shut-off. If the customer fails to pay per the terms of the termination notice, service is shut off.

When the service is shut off for non-payment, the terminated customer has up to 109 days to pay the full catch-up CAP amount, including any CAP bills that may have come due during the shut-off process, plus reconnection fees. Upon receipt of the full catch-up amount and the reconnection fee, the customer will be returned to CAP. If the terminated customer does not pay the full catch-up amount within 109 days, the customer will be removed from CAP and the customer will be responsible to make full payment of any outstanding balance and reconnections fees prior to the reconnection of service. Upon full payment and service restoration, the customer may then re-apply to enroll in CAP. One additional exception to the reinstatement policy would be when the customer's actual balance is less than the CAP balance.

UGI Utilities, Inc. Operation Share hardship funds will be permitted to be used for reconnection fees for all eligible UGI customers.

O. REINSTATEMENT POLICY

Customers requesting reinstatement must comply with and agree to all applicable program eligibility requirements and customer obligations. As a condition of reinstatement, a customer must:

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- provide adequate assurance that the reason(s) for the prior default and resulting program dismissal have been removed or corrected; and
- make up all missed CAP payments or full balance when appropriate before reinstatement.

As a condition of reinstatement, a customer may also be required, depending upon individual circumstances, to make an up-front payment. Upfront payments are most common for a customer that is looking to restore service and remain on CAP. A reconnection charge can be required as an upfront payment. Another scenario where an upfront payment is required is when it is a prerequisite for the customer's receipt of additional grants or program services. For example, if a customer owes \$500 in missed CAP payments, a CBO may require the customer to pay \$300 which permits the CBO to approve \$200 in Federal Emergency Management Agency ("FEMA") funds. The Companies never charge a CAP participant a security deposit for reconnection of service.

As stated above, UGI Utilities, Inc. Operation Share hardship funds will be permitted to be used for reconnection fees for all eligible UGI customers.

If a customer voluntarily removes themselves from CAP for seasonal short-term benefit, the customer will not be eligible again until after a one-year waiting period. The customer, however, would be able to have their CAP reinstated before the year if they, at the time of their request, can satisfy the CAP amount covering both the missed CAP payments while on CAP, and the month(s) they spent out of the program (i.e. CAP catch-up amount).

Finally, pursuant to Paragraph 48(b) of the 2022 Gas Rate Case Settlement, UGI Gas agreed to continue its outreach to active customers who have been removed from CAP due to failure to recertify. If these Gas customers submit income documentation, they will be reenrolled, and any arrearage accrued will be included with their existing pre-program arrearages.

P. CAP UNIVERSAL SERVICE REQUIREMENTS REPORTING

As required by the August 8th Order, by April 1st of each year, UGI Utilities, Inc. shall file and serve a report at these dockets detailing the following information by utility, FPIG level, and account type for the preceding calendar:

- CAP Participation Rate;
- Average Annual CAP Credits;
- Number of CAP accounts that exceeds the previous maximum CAP Credit limit;
- Total dollars above previous maximum CAP Credit limit;
- Average of CAP credits above previous maximum CAP Credits;
- Gross Write-Offs in Dollars by Residential Customers and Confirmed Low-Income Customers
- The difference in pre-program and current energy usage (+/-) of CAP customers

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who exceeded energy usage thresholds but received energy conservation assistance from a CAP caseworker (stated as an average yearly percentage)

VI. LIURP

A. INTRODUCTION

UGI's LIURP consists of a Weatherization Program and a Rehabilitation Program.

B. FUNDING AND BUDGET

See Appendix A for a more detailed discussion of the program budgets.

C. LIURP ENROLLMENT LEVELS

The table shows the number of jobs completed per Company and the associated spending for the period of 2014 through 2016.

| Company | Number of jobs | Cost |
|----------------|-----------------------|-------------|
| UGI Gas | 318 | \$2,048,978 |
| PNG | 399 | \$2,566,887 |
| CPG | 194 | \$1,131,508 |
| UGI Electric | 71 | \$287,895 |

D. LIURP REPORTING REQUIREMENTS

The Companies report all data required by the LIURP codebook.

E. LIURP WEATHERIZATION PROGRAM

The LIURP Weatherization Program is offered to reduce the energy consumption of low-income customers through the installation of energy conservation measures and energy conservation education. By reducing the energy consumption of these customers, the intent of LIURP is to reduce customer arrearage, collection and termination costs. The program places top priority on the health and safety of all LIURP participants.

Program services are provided free of charge to the customer. Upon verification of program eligibility by the LIURP agency, each LIURP heating customer will receive an on-site energy survey/audit. Energy saving measures for gas customers and electric space heat customers may include, but are not limited to, the following: insulation, furnace repair/replacement, water

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heater repair/replacement, furnace efficiency modification, windows and baseboard caulking, door and window weather stripping, door sweeps and thresholds, replacement of broken window panes, storm windows, attic ventilation, electrical outlet and switch plate gaskets on outside walls, water conservation measures, energy education, infiltration measures and incidental repairs (necessary to the effective performance of weatherization materials). Low cost energy saving measures for electric non-heating customers may include but are not limited to refrigerator replacement, high efficiency lighting, window air conditioner replacement and other measures necessary to the effective performance of weatherization materials within the job limit costs. Eligible electric non heating customers may receive an in home or telephonic energy education sessions. For the 2020-2025 USECP, UGI will begin to provide UGI Electric weatherization participants with an Energy Conservation Kit containing items they may install to reduce electric consumption.

Energy saving measures installed will be those Commission-approved measures in the LIURP codebook. Job inspections are completed by a third-party agency.

Additionally, UGI Gas will, in this 2020-2025 USECP, expand the use of LIURP Weatherization Program funds to address the repair or replacement of its residential customers' inoperable gas furnaces. UGI Gas will increase its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary.⁵¹ For LIURP jobs where Gas furnace replacement is not necessary, the per job maximum will be \$8,000. Additionally, UGI Gas will set aside \$250,000 annually from its general LIURP budget for furnace repair and replacement projects. For the first two years of the USECP, any unused amounts will roll over to the next year's budget for furnace repair and replacement projects. Should there continue to be amounts to roll over after two years, any remaining roll over amounts will roll over to UGI Gas's general LIURP budget up until 2022. Thereafter, per Paragraph 44(a) the 2022 Rate Case Settlement, UGI Gas will increase its general LIURP budget by \$250,000: (1) beginning January 1, 2023; and (2) beginning January 1, 2024. Effective January 1, 2024, the general LIURP budget shall remain unchanged until the Commission approves a change thereto. However, if more than 25% of the general LIURP budget remains unspent on or after January 1, 2025, or in each year thereafter, the Company will take reasonable efforts to spend the funds within the first 6 months of the next year. If, after reasonable efforts are undertaken to spend the unspent funds within the 6 month period, funds still remain, they will not roll forward. In its August 8, Order, the Commission has approved UGI Gas's petition to waive the LIURP regulation payback requirement at 52 Pa. Code § 58.11(a) and the high-use criteria at 52 Pa. Code § 58.10(a)(1) for customers needing furnace repair or replacement.

1. Weatherization Program Administration

Refer to **Appendix D** for the CBOs currently contracted for the provision of energy survey and measure installation. Per Paragraph 59(a) of the 2023 Electric Rate Case Settlement, within 60 days after the final order is entered in that proceeding, which occurred on September 21, 2023,

⁵¹ Pursuant to Paragraph 44(b) of the 2022 Gas Rate Case Settlement, UGI Gas increased its per-job LIURP funding cap to \$14,000 where furnace replacement is necessary.

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UGI Electric agreed to issue an RFP for an additional LIURP resource, including CBOs in UGI Electric's service territory, capable of performing 20 additional baseload and 10 additional heating jobs annually. UGI issued the RFP on October 18, 2023 and responses were due by December 1, 2023 at noon. UGI Electric awarded the bid to Agency for Community Empowerment of NEPA in December 2023 to perform the 20 additional baseload and 10 additional heating jobs annually, beginning February 1, 2024.⁵² In addition, UGI engages a third-party to independently verify that home weatherization was completed in accordance with LIURP standards.

2. Weatherization Program Eligibility

To be eligible for the LIURP Weatherization Program, the customer must be able to demonstrate the following:⁵³

- the customer is an active residential gas heating customer or residential electric customer;⁵⁴
- the customer's gross household income is at or below the current 150% of the FPIG (for UGI Electric customers and for UGI Gas customers up until 2023);⁵⁵
- the customer's gross household income is between 151 and 200% of the FPIG, for UGI Gas customers, beginning January 2023⁵⁶ and for UGI Electric customers, beginning January 1, 2024 (pursuant to Paragraph 59(b) of the 2023 Electric Rate Case Settlement). Also in accordance with Paragraph 59(b) of the 2023 Electric Rate Case Settlement, for UGI Electric customers between 151% and 200% FPL, beginning January 1, 2024, a limit of 20% of the overall Electric LIURP budget shall apply for jobs related to Electric customers falling between 151% and 200% FPL.⁵⁷
- the customer's annual consumption is above average usage; Above average usage is defined as a customer who exceeded the average residential threshold by 25% for electric customers (baseload and heat) and 30% for natural gas customers. The threshold will be reviewed annually to consider significant changes in usage patterns.

⁵² March 4th Filing.

⁵³ Exceptions may be granted.

⁵⁴ UGI Gas will waive the requirement that the customer be an active gas heating customer for the purpose of furnace repair or replacement spending.

⁵⁵ However, up to 20% of LIURP participants may have a household income at 151-200% of the FPIG, on a first-come, first-serve basis.

⁵⁶ Per Paragraph 44(c) of the 2022 Gas Rate Case Settlement, UGI Gas expanded LIURP access to Gas customers between 151% and 200% of the FPIG to commence on January 1, 2023.

⁵⁷ March 4th Filing.

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| Division | High Usage |
|-----------------|-----------------------|
| UGI Gas | 877 ccf ⁵⁸ |
| UGI Electric | 12,788 kwh |

- the customer has had continuous service for twelve months;
- the customer's premises are suitable for weatherization services;⁵⁹ and
- the customer's premise is the customer's primary residence.⁶⁰
- The premise has not received LIURP weatherization services for the past seven (7) years.

Residential accounts with the following indicators are not eligible for the LIURP Weatherization Program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner's name);
- utility service used to operate a swimming pool
- a residential property where more than fifty percent of the anticipated gas usage served through a single meter is used to operate the business.

3. Weatherization Program Outreach and Intake Efforts

UGI is in constant contact with weatherization CBOs, local government, weatherization providers and any other appropriate agencies for input and advice on the most efficient and effective methods to provide LIURP weatherization services without duplication or exclusion. Through the use of local CBOs, such as LIURP providers found in **Appendix D**, integration of

⁵⁸ Per Paragraph 44(d) of the 2022 Gas Rate Case Settlement, no later than January 27, 2023, UGI Gas will lower its LIURP minimum usage threshold to 73.1 Ccf per month for customers at or below 200% FPIG. The 877 ccf in Table 6 represents the monthly 73.1 ccf amount totaled over a 12 month period.

⁵⁹ Program measures follow applicable payback periods; therefore, a customer's residence that has been previously weatherized may not be eligible for LIURP until the applicable payback period has expired.

⁶⁰ The program is available to both homeowners and renters. Renters can qualify with written permission from landlords.

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federal, state and local funds for LIURP weatherization participants are more easily accomplished. UGI will inform each LIURP weatherization participant of any and all appropriate services.

4. Weatherization Program Identification & Referral of Low-Income Customers

With the use of COS for the administration of LIURP, UGI reviews its customer records to identify high usage, high arrearage, low income customers. In addition, UGI accepts referrals from CBOs, community groups and customer inquiries. LIURP referrals may also come from UGI's Energy Efficiency and Conservation Plan program management.

5. Weatherization Program Inter-Utility Coordination

UGI maintains contact with appropriate gas and electric utilities within their service territory to initiate inter-utility coordination with both NGDCs and EDCs when applicable.⁶¹ UGI and the other utilities coordinate comprehensive program services to better serve LIURP weatherization customers. In many cases, UGI and the corresponding utility employ the same LIURP measure installer. Therefore, inter-utility coordination may be accomplished without the need for written contract or inter-utility billing. As previously stated in the CAP section, UGI will form a USAC which will hold two annual meetings. UGI will include the electric utilities that overlap its gas service territory to these meetings to continue to discuss the coordination of the provision of LIURP services, and particularly, to improve identification of customers with inoperable natural gas furnaces who may be using electricity for space heating so as to improve the provision of LIURP services for those customers.

F. REHABILITATION PROGRAM

Through the Rehabilitation Program, UGI funds the installation of energy efficient measures at the time of construction or rehabilitation of low-income residential housing. These measures include the installation of ENERGY STAR rated high efficiency natural gas furnaces, hot water heaters, upgraded installation, and energy efficient windows.

The Rehabilitation Program achieves usage reduction by: (1) allowing identified low-income and special needs customers to benefit from a variety of energy efficient measures which will avoid future high usage, and (2) maximizing the LIURP dollars spent on installed weatherization measures. Specifically, this program treats low income housing at the construction/rehabilitation phase in order to maximize material and labor dollars. The expectation is that these homes could eventually receive LIURP services. Therefore, through this program, these customers receive service at the construction/rehabilitation phase to assist in covering the costs of the project(s) and to avoid future high usage and arrearage problems. By implementing energy efficiency measures at the rehabilitation or construction phase, the overall cost of the

⁶¹ UGI restates its commitment to coordinating with EDCs in overlapping service territories who may be providing similar services pursuant to Act 129.

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measures can be more economical than implementing them after the construction is complete. UGI periodically joins forces with rehabilitation projects within its service area to assure energy efficiency in low income housing.

1. Rehabilitation Program Eligibility

Each Rehabilitation Program project must have the following criteria to qualify for LIURP services and/or funds:

- the customer is an active residential gas heating customer or residential electric customer;
- the customer's premise is the customer's primary residence.⁶²
- the customer's gross household income is at or below the current 200% of the FPIG; and
- existing gas heat or electric heating customer;⁶³ and
- coordination with a CBO(s).

Possible CBOs that would become involved in this project include:

- Neighborhood Housing Services;
- Habitat for Humanity;
- Housing Authorities; and
- Community Development Offices.

Residential accounts with the following indicators are not eligible for the LIURP Rehabilitation Program:

- health care facilities;
- landlord/tenant (account is in the landlord's name);
- ratepayer/occupant (the ratepayer does not reside at the property);
- foreign load (one-meter supplies more than one unit);
- LIFSO agreement (account is in the owner's name);
- utility service used to operate a swimming pool.
- a residential property where more than fifty percent of the anticipated gas usage served through a single meter is used to operate the business.

All LIURP required information will be collected for each dwelling.

UGI will reserve up to 10% of its total current year LIURP budget for Rehabilitation Project Funding. If the entire budgeted amount is not expended, the remainder will be returned to

⁶² The program is available to both homeowners and renters. Renters can qualify with written permission from landlords.

⁶³ Customers of UGI-Electric with electric heat are eligible to participate in the LIURP Rehabilitation Program.

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traditional LIURP services funding.

As with the 2014-2017 USECP, UGI: (1) will limit the use of LIURP funding under this program to residential rate housing units and, in the case of rental housing units, only where the tenant has payment responsibilities for the utility service; (2) may direct funds to HOME developments, the Low Income Housing Tax Credit (“LIHTC”) program and to non-profit agencies; and (3) will track customer participation levels and energy savings on a prospective basis.

In the 2020-2025 UGI will continue to track and report the program results and details separately.

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APPENDIX A

FUNDING COMMITMENTS FOR EACH UNIVERSAL SERVICE PROGRAM

I. UGI PROJECTED PARTICIPATION AND BUDGET PER PROGRAM

Projected participation and budgets for USECP programs are set forth below. For LIURP and Operation Share, participation and budget figures are provided for the geographic footprints of the UGI Gas Division's former three rate districts in accordance with settlement paragraph 38 of the 2019 UGI Gas Rate Case Settlement.

A. CAP

1. UGI Gas

UGI Gas's projected participation levels and budget for CAP is shown:

| Year | Projected Participation Levels | Projected Budget |
|------|--------------------------------|------------------|
| 2020 | 27,813 | \$15,019,020 |
| 2021 | 23,237 | \$10,004,469 |
| 2022 | 26,781 | \$13,361,408 |
| 2023 | 29,963 | \$14,949,200 |
| 2024 | 33,549 | \$16,738,000 |
| 2025 | 37,602 | \$18,760,214 |

2. UGI Electric

UGI Electric's projected participation levels and budget for CAP is shown below:

| Year | Projected Participation Levels | Projected Budget |
|------|--------------------------------|------------------|
| 2020 | 3,702 | \$3,954,056 |
| 2021 | 3,179 | \$2,141,773 |
| 2022 | 3,664 | \$4,123,879 |
| 2023 | 4,099 | \$4,612,896 |
| 2024 | 4,589 | \$5,165,083 |
| 2025 | 5,144 | \$5,789,179 |

B. LIURP

The projected LIURP participation levels and budgets for the geographic footprint of the former UGI Gas rate districts, and the UGI Electric service territory are set forth in tables A-3 and A-4.

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| Table A-3.⁶⁴ LIURP Participation Levels & Budget - 2023⁶⁵ | | |
|--|---------------------------------------|-------------------------|
| Geographic Area | Projected Participation Levels | Projected Budget |
| South | 202 | \$1,795,292 |
| North | 194 | \$1,428,162 |
| Central | 85 | \$740,896 |
| UGI Electric | 66 | \$298,379 |

| Table A-4. LIURP Participation Levels & Budget - 2024-2025 | | |
|---|---------------------------------------|-------------------------|
| Geographic Area | Projected Participation Levels | Projected Budget |
| South | 202 | \$1,949,485 |
| North | 194 | \$1,493,274 |
| Central | 85 | \$771,591 |
| UGI Electric | 66 | \$298,379 |

C. OPERATION SHARE HARDSHIP FUND

| Table A-5. UGI Operation Share Company Annual Funding Level for 2020 – 2025⁶⁶ | | |
|---|-------------------------------|--|
| Geographic Area | Energy Funds Amount | |
| South | \$310,500 | |
| North | \$177,500 | |
| Central | \$96,500 | |
| Electric | \$117,423 | |
| Subtotal | \$701,923 | |
| Total | \$701,923⁶⁷ | |

⁶⁴ Upon reviewing the LIURP budgets for the October 28th Filing, it was determined that the total Projected Budget amount was never updated in Table A3 to include \$80,000 from Paragraph 28(d)(iii) in UGI Gas’s 2020 Base Rate Case Settlement at Docket No. R-2019-3015162. According to that settlement provision, UGI Gas agreed that beginning July 1, 2021, it would increase the annual LIURP budget by an amount proportionate to the percentage distribution rate increase for the Residential class, which equaled \$80,000 per year on a calendar basis. While UGI Gas inadvertently omitted this amount from Table A3 previously, UGI Gas entered the \$80,000 into its annual LIURP budget. Accordingly, UGI Gas is adding the previously omitted \$80,000 figure into the annual LIURP budget in Table A3.

⁶⁵ The 2022 Gas Rate Case Settlement increased the aggregate UGI Gas LIURP budget by \$250,000 in 2023 and 2024. The increased budget amounts were allocated between the different geographic areas of the service territory.

⁶⁶ While Table A-5 does not include employee or Customer donations, the Company will match the annual amount of donations received. Additionally, per the 2022 Gas Rate Case Settlement, the Company agreed to make a one-time payment of \$500,000 during the winter of 2022-2023. Because the \$500,000 will be a one time payment, it was not reflected in Table A-5 because that table states what the annual budget amounts will be over a 5 year period.

⁶⁷ March 4th Filing.

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APPENDIX A

| Table A-6. UGI Operation Share Annual Costs by Geographic Area for 2020 – 2025⁶⁸ | | | | | | |
|--|---------------------------------------|---------------------------------------|--|---------------------------------|------------------------|---|
| Geographic Area | Projected Participation Levels | Initial Contribution (voucher) | | Projected CASH donations | Total Donations | Projected Administrative Budget⁶⁹ |
| South | 385 | \$310,500 | | \$80,000 | \$390,500 | \$5,775 |
| North | 185 | \$177,500 | | \$20,000 | \$197,500 | \$2,775 |
| Central | 120 | \$96,500 | | \$26,000 | \$122,500 | \$1,800 |
| Electric | 98 | \$80,500 | | \$35,000 | \$115,500 | \$1,470 |

UGI proposes to allocate available funds to administering agencies, based on the 2010 Census Data, as updated in 2015, and the Commission’s estimate of the number of residents under 150% of the FPIG, as follows:

⁶⁸ Cash donations are donations provided by utility customers.

⁶⁹ The increase is due to per-grant CBO fee increase from \$10 to \$15.

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APPENDIX A

| Table A-7. UGI Allocations by Geographic Area | | |
|--|---|--------------------------------------|
| Former Rate District | Agency | Inter-Area Funding Allocation |
| UGI South | Allentown Salvation Army | 15% |
| | Bethlehem Salvation Army | 5% |
| | Easton Salvation Army | 10% |
| | Harrisburg Salvation Army | 21% |
| | Hazleton Commission on Economic Opportunity | 3% |
| | Lancaster Community Action Program | 19% |
| | Lebanon Christian Ministries | 5% |
| | Reading Salvation Army | 12% |
| | NHS | 10% |
| North | AGAPE | 7% |
| | Commission on Economic Opportunity | 35% |
| | Scranton Salvation Army | 38% |
| | S.T.E.P., Inc. | 11% |
| | TREHAB, Inc. | 2% |
| | Union-Snyder Community Action Agency | 7% |
| Central | Central PA Community Action | 8% |
| | Central Susquehanna Opportunities | 12% |
| | East Stroudsburg Salvation Army | 6% |
| | Hamburg Salvation Army | 20% |
| | Commission on Economic Opportunity | 8% |
| | Northern Tier Community Action Corp | 14% |
| | Schuylkill County Community Action | 5% |
| | S.T.E.P., Inc. | 2% |
| | TREHAB, Inc. | 24% |
| | Union-Snyder Community Action Agency | 1% |

Each administering agency must spend their share of donations in order to maintain the allocation of funds; otherwise, UGI reserves the right to reallocate the funds to another administering agency. Furthermore, if and when there is a change to the existing administering agencies, such as, for example, an addition or removal of an agency, UGI will revise the amounts allocated to the administering agencies accordingly.

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APPENDIX A

D. CARES

UGI Gas's projected participation levels and budget for LIHEAP and CARES Outreach are shown below:

| Table A-8. UGI Gas CARES Participation Levels & Budget 2020-2025 | |
|---|-------------------------|
| Projected Participation Levels | Projected Budget |
| 185 | \$115,000 |

UGI Electric's projected participation levels and budget for CARES is shown below:

| Table A-9. UGI Electric CARES Participation Levels & Budget 2020-2025 | |
|--|-------------------------|
| Projected Participation Levels | Projected Budget |
| 20 | \$20,000 |

II. UGI RIDER USP

In accordance with the Company's Gas Tariff⁷⁰ and Electric Tariff⁷¹ available at <https://www.ugi.com/tariffs/>, UGI is permitted to recover costs for the USECP under its USP Riders with an annual reconciliation for costs and recoveries. The Rider USP rate shall be calculated to recover costs for the following programs: LIURP; CAP; Hardship Funds; and any other replacement or Commission-mandated Universal Service Program or low-income program that is implemented during the period that the Rider is in effect.

⁷⁰ UGI Gas – Pa. P.U.C. No. 7.

⁷¹ UGI Electric Pa. P.U.C. No. 6.

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APPENDIX B

PROJECTED NEEDS ASSESSMENT

Per 52 Pa. Code § 62.4(b)(3), NGDCs with more than 100,000 residential accounts are required to provide a projected needs assessment for each Universal Service Program component and provide an explanation of how each program component responds to one or more identified needs. Per 52 Pa. Code § 62.7, UGI did not conduct a projected needs assessment for the former Central Rate District as it served fewer than 100,000 residential accounts. Likewise, UGI Electric is not required to conduct a projected needs assessment since it serves fewer than 60,000 residential accounts, as per 52 Pa. Code § 54.77.

The needs assessment for the former UGI South and UGI North Rate Districts, based on 2015 Census Data, included the number of estimated and identified low-income customers, the number of estimated and identified payment-troubled, low-income customers, the number of customers still needing LIURP services and the cost to serve them and the enrollment size of CAP to serve all eligible customers.

| Table B-1. | | |
|--|-------------------------|-------------------------|
| | <u>UGI SOUTH</u> | <u>UGI NORTH</u> |
| 1. Number of Identified Low-Income Customers | 34,269 | 23,061 |
| 2. Estimate of Number of Low-Income Customers | 91,478 | 49,410 |
| 3. Number of Identified Payment-Troubled, Low-Income Customers ⁷² | 8,353 | 4,663 |
| 4. Number of Customers in Need of LIURP Services ⁷³ | 5,251 | 4,756 |
| 5. Cost of Serving the Number of Customers in Need of LIURP Services | \$36,142,633 | \$28,131,740 |
| 6. Enrollment Size of CAP to Serve all Eligible Customers | 34,269 | 23,061 |

In future USECPs the Company will provide a consolidated needs assessment for the Gas Division that will incorporate all former rate districts.

⁷² 52 Pa. Code § 62.4 requires the inclusion of estimated low-income payment-troubled customers in a NGDC's needs assessment. Due to the methodology employed by the UGI Companies, this figure is equal to the identified payment-troubled low-income customers set forth in line 3 and is not repeated to avoid redundancy.

⁷³ This figure accounts for the following eligibility criteria: (1) identified low-income; (2) 12 months of consecutive service; (3) meeting LIURP usage criteria; (4) premises not having received LIURP weatherization services within the past seven (7) years. The UGI Companies may grant exceptions where warranted on a case-by-case basis to customers who do not meet this eligibility criteria and will report exceptions annually to the Commission.

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APPENDIX C

CAP COMMUNITY BASED ORGANIZATIONS

| Table C-1. | | |
|--|-------------------------------------|---------------------------------|
| <u>CBO</u> | <u>Communication Methods</u> | <u>Geographic Region</u> |
| Commission on Economic Opportunity | Mail, Email, & Fax | All Gas and Electric |
| Easton Area Neighborhood Center | Mail, Email, & Fax | South |
| Lancaster CAP | Mail, Email, & Fax | South |
| Lebanon County Christian Ministries | Mail, Email, & Fax | South |
| Neighborhood Housing Services of Greater Berks, Inc. | Mail, Email, & Fax | South |
| The Salvation Army | Mail, Email, & Fax | South |
| AGAPE | Mail, Email, & Fax | North |
| Scranton Lackawanna Human Development Agency-SLHDA | Mail, Email, & Fax | North |
| Social Service Assistance Program - S.T.E.P., Inc. | Mail, Email, & Fax | North, Central |
| TREHAB, Inc. | Mail, Email, & Fax | North, Central |
| Union-Snyder Community Action Agency | Mail, Email, & Fax | North, Central |
| Central PA Community Action Program, Inc. | Mail, Email, & Fax | Central |
| Central Susquehanna Opportunities, Inc. | Mail, Email, & Fax | Central |
| Northern Tier Community Action Agency/SLHDA | Mail, Email, & Fax | Central |
| Schuylkill County Community Action | Mail, Email, & Fax | Central |

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APPENDIX D

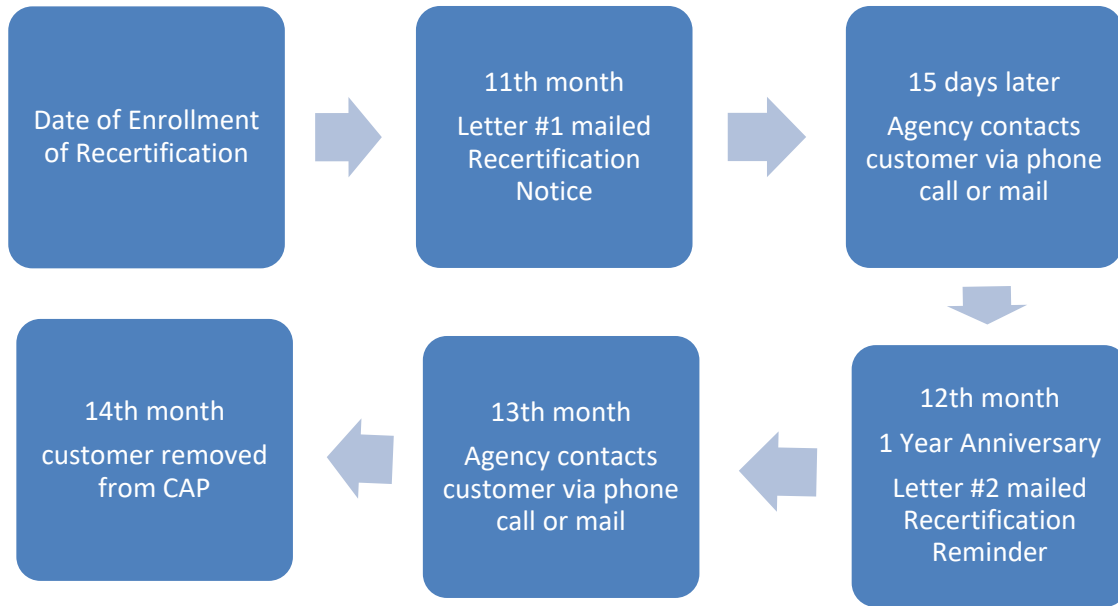
LIURP AGENCIES

| Table D-1 | | |
|---|-----------------------|-------------------------------|
| <u>CBO</u> | <u>City</u> | <u>Geographic Area</u> |
| Berks Community Action Program | Reading | South, Central |
| Commission on Economic Opportunity | Kingston | South, North, Electric |
| Community Action Committee of the Lehigh Valley and Central PA | Bethlehem, Clearfield | South |
| Central PA Community Action | Clearfield | Central |
| Northern Tier Community Action | Emporium | Central |
| South Central Community Action Program | Gettysburg | South |
| Scranton- Lackawanna Human Development Agency now known as Agency for Community Empowerment of NEPA | Scranton | North, Central, Electric |
| SOLAIR, Inc. | Ralston | Electric |
| SEDA-COG | Canton, Lewisburg | North, Central |
| Carbon County Action Committee for Human Services | Lehighton | Central |
| Advanced Efficiency Worx | York | South |
| CLEARResult | Scotrun | South, Central |
| | | |
| Green Kite | Gratz | South, Central |
| MT Weatherization | Hummelstown | South |
| Harron's Insulation and Ceilings | Reading | South |
| | | |
| York Home Performance | York | South |

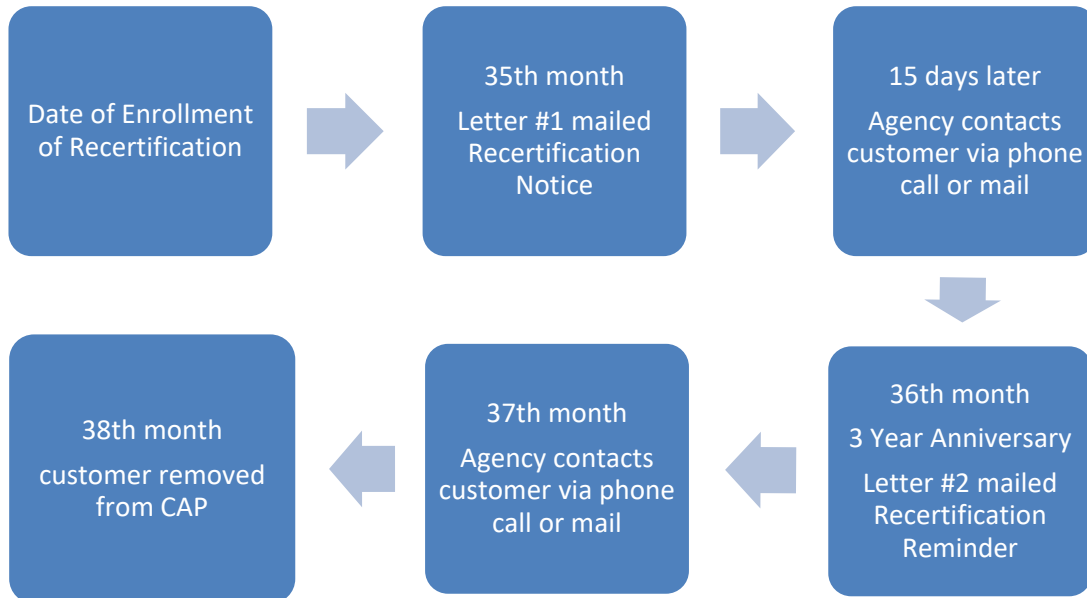
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APPENDIX E

Notification Schedule for CAP Recertification Process-NO LIHEAP (Annual Certification)



Notification Schedule for CAP Recertification Process-LIHEAP (Triennial Certification)



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APPENDIX F

**UGI
Universal Service Customer Assistance Program**

Customer Name: _____

Date of Application: _____

Account #: _____

Service Address: _____

Verification of Zero Income Claim

To be completed and signed by the UGI customer who had no income during the 30-day, 90 day or 1-year period before the date of this CAP application.

Verification:

I, (print) _____, state that I have had no income from any source. I understand that participation in CAP can be denied for making false statements and do affirm that all claims made here are true and correct to the best of my knowledge, information and belief. Any change in household income or occupants will be immediately reported to my assigned CAP agency. I give UGI and/or my assigned CAP agency permission to verify income with government agencies.

List all adult household members with zero income:

1. _____
2. _____
3. _____

During the above period, how were household expenses met for food and shelter?

Customer Signature: _____

Agency Representative: _____

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APPENDIX G



CAP- Agency Audit Scorecard

Agency _____

Account Number _____ Customer Name _____

Does the account being audited contain the following:

- | YES | NO | N/A | |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | | APPLICATION |
| <input type="checkbox"/> | <input type="checkbox"/> | | CONSENT AND RELEASE FORM |
| <input type="checkbox"/> | <input type="checkbox"/> | | TRUTH OF STATEMENT |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | PROOF OF INCOME |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | PROOF OF IDENTIFICATION |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOCUMENTATION ON THE ACCOUNT LOG |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOES THE INFORMATION ENTERED IN COS MATCH THE APPLICATION? |
| <input type="checkbox"/> | <input type="checkbox"/> | | DOES THE PROOF OF INCOME INFORMATION MATCH THE APPLICATION? |
| <input type="checkbox"/> | <input type="checkbox"/> | | COMPLIES WITH RECORD RETENTION POLICY |

The following may not be applicable for all accounts:

- | YES | NO | N/A | |
|--------------------------|--------------------------|--------------------------|--------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | RECERTIFICATION FORM COMPLETED |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | HIGH USAGE QUESTIONNAIRE |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ZERO INCOME FORM |

Auditor Comments _____

Auditors Initials _____

Date _____