

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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BHAVIN PATEL, : DOCKET NO.  
Complainant : C-2023-3038563

v. :

UGI UTILITIES, INC., :  
Respondent :

Initial Telephonic Call In Hearing :

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Pages 1 through 109

Judge's Chambers  
State Office Building  
801 Market Street  
Philadelphia, Pennsylvania

Wednesday, May 29, 2024  
Commencing at 10:00 a.m.

BEFORE:

ADMINISTRATIVE LAW JUDGE MARTA GUHL

REPORTER:

Lori A. Fausnaught, RPR, RMR, CRR

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KARASCH & ASSOCIATES (800) 621-5689

## INDEX TO EXHIBITS

ALJ GUHL: ID'd/ADMITTED

Exhibit Complainant's No. 1 17 / 100  
(Complainant's Direct Statement)

Exhibit Complainant's No. 2 100 / 100  
(Formal Complaint form)

## COMPLAINANT:

Exhibit A 17 / --  
(Gambling Odds)

Exhibit B 41 / 101  
(4 Scenario WNA Calculations)

Exhibit C 41 / 101  
(WNA Calculations)

Exhibit D 41 / 101  
(WNA Usage Chart by Mr. Patel)

## RESPONDENT:

UGI Gas Exhibit No. 1 38 / 103  
(WNA charges September-May)

UGI Gas Exhibit No. 2 39 / 103  
(Rider C to WNA)

UGI Gas Exhibit No. 3 40 / 103  
(UGI billings)

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## RESPONDENT REBUTTAL:

UGI Gas Exhibit No. 1-R 26 / 103  
(Doc Statement w/below attachements)

Attachment No. JDT 1-R 26 / 103  
(Taylor written statement)

Attachment No. KMB 2-R 26 / 103  
(Bassininsky written statement)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Docket No. C-2023-3038563

Bhavin Patel                      vs.                      UGI Utilities, Inc. – Gas Division

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**BHAVIN PATEL'S DIRECT STATEMENT**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Unknown to me, any procedure, including Direct Statements, and unable to find any template or example online, I will do my best to write following direct statement in this matter. Unknown to me the purpose of a direct statement or it's mis-usage in anyway, not explained to me by anyone upon my request, this shall serve as a protection to me in case of it's misuse.

Direct Statement:

I, Bhavin Patel, am a customer of UGI Natural Gas Utility Company. I have filed complaint to PUC regarding charge called WNA. I have been a customer of UGI since 2013. I have never experienced WNA charge in the 10 years until the Fall of 2022 going into Winter and Spring of 2023. I truly believe this WNA charge is unjust, unfair, unrelated to actual natural gas usage, and is a scheme to rob all customers. I filed this complaint to have WNA reversed, reimbused, and removed completely for the entire customer base. In the event or outcome where my complaint is successful and that WNA is removed, I seek UGI Company to compensate me \$1,000,000,000,000 USD (One Trillion USD) per year for every year that WNA was implemented and executed. Otherwise, in the event or outcome where my complaint is unsuccessful and that WNA is NOT removed, I seek UGI Company to compensate me \$3,000,000,000,000 USD (Three Trillion USD) per year for every year that WNA stays implemented and executed (past and future). Otherwise, in any event or outcome that falls in between or partial (fail-safe), I seek UGI Company to compensate me an appropriate amount that is at least three times (3x) what is collected as WNA charges from all it's entire customer base but not less than Two Trillion USD per year (which ever is more) for every year that WNA stays implemented and executed (past and future). Any unforeseen outcome of this complaint, including but not limited to: dismissal, absence, failure to complete, failure to begin, or even no action by end of 2023 should result in my complaint being unsuccessful which qualifies as one of the three outcomes above resulting in Three Trillion USD per year compensation from UGI to myself as stated above.

This above is my direct statement on this matter regarding WNA charge introduced by UGI Company.

Thank you  
Bhavin.



**Bhavin Patel v. UGI Gas**  
**Exhibit B Docket No. C-2023-3038563**

Case 1 Colder Days (AHDD > NHDD); & AMC (winter usage) is > than BLMC (summer usage)

AHDD	1000	<b>+3 Calc</b>	<b>-3 Calc</b>	
NHDD	800	84.16 WNBC	79.84 WNBC	
NHDD + 3%	824	-15.84 WNAC	-20.16 WNAC	
NHDD - 3%	776	-7.9238016 WNA	-10.0848384 WNA	+ = Pay UGI & - = Credit to Me
AMC	100			
BLMC	10			

Case 2 Colder Days (AHDD > NHDD); & AMC (winter usage) is < than BLMC (summer usage)

**THIS WILL NEVER HAPPEN BECAUSE WINTER USES MORE GAS THAN SUMMER**

AHDD	1000	<b>+3 Calc</b>	<b>-3 Calc</b>	
NHDD	800	25.84 WNBC	30.16 WNBC	
NHDD + 3%	824	15.84 WNAC	20.16 WNAC	
NHDD - 3%	776	7.9238016 WNA	10.0848384 WNA	+ = Pay UGI & - = Credit to Me
AMC	10	←----- Also see JDT Testimony Page 12		
BLMC	100	←----- Also see JDT Testimony Page 12		

Case 3 Warmer Days (AHDD < NHDD); & AMC (winter usage) is > than BLMC (summer usage)

AHDD	800	<b>+3 Calc</b>	<b>-3 Calc</b>	
NHDD	1000	125.875 WNBC	119.125 WNBC	
NHDD + 3%	1030	25.875 WNAC	19.125 WNAC	
NHDD - 3%	970	12.94371 WNA	9.56709 WNA	+ = Pay UGI & - = Credit to Me
AMC	100			
BLMC	10			

Case 4 Warmer Days (AHDD < NHDD); & AMC (winter usage) is < than BLMC (summer usage)

**THIS WILL NEVER HAPPEN BECAUSE WINTER USES MORE GAS THAN SUMMER**

AHDD	800	<b>+3 Calc</b>	<b>-3 Calc</b>	
NHDD	1000	-15.875 WNBC	-9.125 WNBC	
NHDD + 3%	1030	-25.875 WNAC	-19.125 WNAC	
NHDD - 3%	970	-12.94371 WNA	-9.56709 WNA	+ = Pay UGI & - = Credit to Me
AMC	10	←----- Also see JDT Testimony Page 12		
BLMC	100	←----- Also see JDT Testimony Page 12		



**Bhavin Patel**  
**Exhibit C**

**v. UGI Gas**  
**Docket No. C-2023-3038563**

**Colder Day Delta vs Warmer Day Delta (w.r.t. Equality) [aka Credit vs Charge Scenarios]**

Date	AHDD	NHDD	NHDD+/-3%	AMC	BLMC	WNBC	WNAC	WNA	
9/2/23-10/3/23	63	47	48	8	8	8	8	0	\$0.00 AMC = BLMC
9/2/23-10/3/23	47	63	61	8	8	8	8	0	\$0.00 AMC = BLMC
10/4/23-11/1/23	297	261	269	40	7	37	-3		-\$1.56 CDCredit
10/4/23-11/1/23	261	297	288	40	7	43	3		\$1.56 WDCharge
11/2/23-12/4/23	711	704	725	96	8	98	2		\$1.04 In 3% range
11/2/23-12/4/23	704	711	690	96	8	94	-2		-\$1.04 In 3% range
12/5/23-1/4/24	921	757	780	88	7	76	-12		-\$6.22 CDCredit
12/5/23-1/4/24	757	921	893	88	7	103	15		\$7.77 WDCharge <span style="background-color: #cccccc; padding: 2px;">+25%</span>
1/5/24-2/2/24	1006	880	906	104	7	94	-10		-\$5.17 CDCredit
1/5/24-2/2/24	880	1006	976	104	7	115	11		\$5.69 WDCharge <span style="background-color: #cccccc; padding: 2px;">+10%</span>
2/3/24-3/5/24	1022	811	835	62	8	52	-10		-\$5.18 CDCredit
2/3/24-3/5/24	811	1022	991	62	8	74	12		\$6.21 WDCharge <span style="background-color: #cccccc; padding: 2px;">+20%</span>
3/6/24-4/4/24	681	554	571	21	7	19	-2		-\$1.04 CDCredit
3/6/24-4/4/24	554	681	661	21	7	24	3		\$1.55 WDCharge <span style="background-color: #cccccc; padding: 2px;">+49%</span>
4/5/24-5/3/24	327	247	254	2	7	3	1		\$0.52 AMC < BLMC
4/5/24-5/3/24	247	327	317	2	7	1	-1		-\$0.52 AMC < BLMC

\*CDCredit = Cold Day Credit

\*WDCharge = Warm Day Charge

\*+% = Steal/fraud Gaurantee (Gauranteed Gamble profit)



**Summary of Current Charges  
for Bill Periods Subject to WNA**



Billing Period	Current Charges	
	Total	Weather Normalization Adjustment
9/2/2023 to 10/3/2023	\$ 25.09	\$ -
10/4/2023 to 11/1/2023	\$ 64.77	\$ 1.56
11/2/2023 to 12/4/2023	\$ 129.51	\$ -
12/5/2023 to 1/4/2024	\$ 128.45	\$ 7.77
1/5/2024 to 2/2/2024	\$ 132.25	\$ 5.69
2/3/2024 to 3/5/2024	\$ 86.67	\$ 6.21
3/6/2024 to 4/4/2024	\$ 39.16	\$ 1.55
4/5/2024 to 5/3/2024	\$ 17.81	\$ -
		<u>\$ 22.78</u>



**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC)]$   
 $WNAC = WNBC - AMC$   
 $WNA = WNAC \times \text{Distribution Charge}$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	9/2/2023 to	10/3/2023
Deadband (%):		3%
Deadband (HDD):		2
Actual Heating Degree Days (AHDD):		47
Normal Heating Degree Days (NHDD):		63
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		61
No. of Days in Billing Period		32
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		8
Actual Consumption Billed (AMC) in Ccfs:		8
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		8
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		-
Weather Normalization Adjustment (WNA):	\$	-

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	10/4/2023 to	11/1/2023
Deadband (%):		3%
Deadband (HDD):		9
Actual Heating Degree Days (AHDD):		261
Normal Heating Degree Days (NHDD):		297
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		288
No. of Days in Billing Period		29
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		7
Actual Consumption Billed (AMC) in Ccfs:		40
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		43
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		3
Weather Normalization Adjustment (WNA):	\$	1.56

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	11/2/2023 to	12/4/2023
Deadband (%):		3%
Deadband (HDD):		21
Actual Heating Degree Days (AHDD):		704
Normal Heating Degree Days (NHDD):		711
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		690
No. of Days in Billing Period		33
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		8
Actual Consumption Billed (AMC) in Ccfs:		96
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		96
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		-
Weather Normalization Adjustment (WNA):	\$	-

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	12/5/2023 to	1/4/2024
Deadband (%):		3%
Deadband (HDD):		28
Actual Heating Degree Days (AHDD):		757
Normal Heating Degree Days (NHDD):		921
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		893
No. of Days in Billing Period		31
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		7
Actual Consumption Billed (AMC) in Ccfs:		88
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		103
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		15
Weather Normalization Adjustment (WNA):	\$	7.77

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	1/5/2024 to	2/2/2024
Deadband (%):		3%
Deadband (HDD):		30
Actual Heating Degree Days (AHDD):		880
Normal Heating Degree Days (NHDD):		1,006
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		976
No. of Days in Billing Period		29
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		7
Actual Consumption Billed (AMC) in Ccfs:		104
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		115
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		11
Weather Normalization Adjustment (WNA):	\$	5.69

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	2/3/2024 to	3/5/2024
Deadband (%):		3%
Deadband (HDD):		31
Actual Heating Degree Days (AHDD):		811
Normal Heating Degree Days (NHDD):		1,022
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		991
No. of Days in Billing Period		32
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		8
Actual Consumption Billed (AMC) in Ccfs:		62
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		74
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		12
Weather Normalization Adjustment (WNA):	\$	6.21

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	3/6/2024 to	4/4/2024
Deadband (%):	3%	
Deadband (HDD):	20	
Actual Heating Degree Days (AHDD):	554	
Normal Heating Degree Days (NHDD):	681	
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	661	
No. of Days in Billing Period	30	
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:	7	
Actual Consumption Billed (AMC) in Ccfs:	21	
Distribution Charge per Ccf:	\$ 0.51764	
Weather Normalized Billing Ccfs (WNBC):	24	
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	3	
Weather Normalization Adjustment (WNA):	\$ 1.55	

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Billing Period:	4/5/2024 to	5/3/2024
Deadband (%):		3%
Deadband (HDD):		10
Actual Heating Degree Days (AHDD):		247
Normal Heating Degree Days (NHDD):		327
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):		317
No. of Days in Billing Period		29
Average Daily Baseload in Ccfs:	0.2350746	
Baseload Monthly (BLMC) in Ccfs:		7
Actual Consumption Billed (AMC) in Ccfs:		2
Distribution Charge per Ccf:	\$	0.51764
Weather Normalized Billing Ccfs (WNBC):		2
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):		-
Weather Normalization Adjustment (WNA):	\$	-



**Billing Summary for Service to:**



**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
09/02/2023 to 10/03/2023 (32 days)  
Actual Read

**Questions?**  
Call (800) 276-2722 or write to UGI at  
PO Box 13009  
Reading, PA 19612-3009

\*Your current UGI charges include State taxes totaling about \$0.26.

**Past Bill Information**

The balance on your last bill was ..... \$-987.81  
Payments ..... 0.00  
Amount due as of 10/06/2023 ..... -987.81

**Account Number**



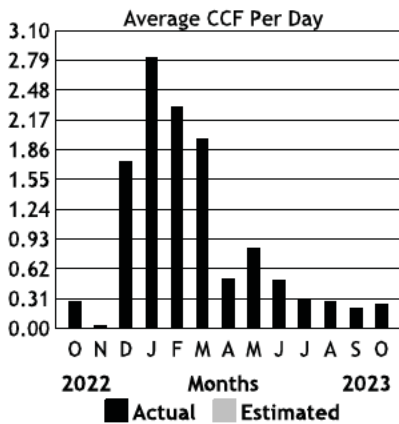
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (8 CCF at \$0.57900) ..... 4.63  
Distribution Charges (8 CCF at \$0.56375) ..... 4.51  
Weather Normalization Adjustment ..... 0.00  
Natural Gas System Improvement Charge ..... 0.95  
Current Charges ..... 25.09

**Utility charges owed this bill** ..... **\$-962.72**

**Current Bill Information - FRONTIER UTILITIES**  
FRONTIER UTILITIES natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... **\$-962.72**



Average	Last Year	This Year
CCF/Day	0.28	0.25
Daily Temperature	66°F	68°F

**Meter Information - Next Read Date November 03, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[Redacted]	4702	4710	8

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [Redacted] Rate Schedule: RT\_H

**Supplier Information**

■ FRONTIER UTILITIES  
601 Travis St Ste 1400  
Houston TX 77002-3253 or Phone Number 866-777-5158

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**



No payment or response required.

**Due Date**

October 27, 2023

**Amount Due**

NONE

**With Late Charge**

NONE

**Exhibit No. 3**



**Billing Summary for Service to:**

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
10/04/2023 to 11/01/2023 (29 days)

**Actual Read Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State taxes totaling about \$0.55.

**Past Bill Information**

The balance on your last bill was ..... \$-962.72  
Payments ..... 0.00  
Amount due as of 11/04/2023 ..... -962.72

**Account Number**

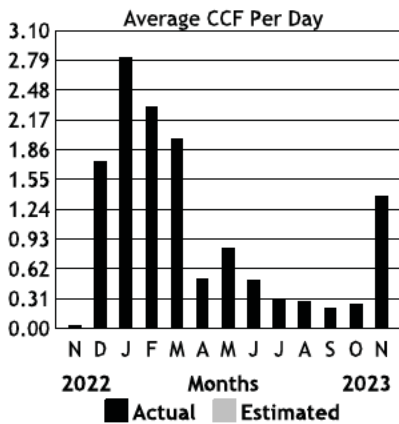
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (40 CCF at \$0.57900) ..... 23.16  
Distribution Charges (40 CCF at \$0.57875) ..... 23.15  
Weather Normalization Adjustment ..... 1.56  
Natural Gas System Improvement Charge ..... 1.91  
PA State Tax Surcharge ..... -0.01  
Current Charges ..... 64.77

**Utility charges owed this bill** ..... **\$-897.95**

**Current Bill Information - FRONTIER UTILITIES**  
FRONTIER UTILITIES natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... **\$-897.95**



Average	Last Year	This Year
CCF/Day	0.03	1.38
Daily Temperature	54° F	57° F

**Meter Information - Next Read Date December 06, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4710	4750	40

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [REDACTED] Rate Schedule: RT\_H

**Supplier Information**

■ FRONTIER UTILITIES  
601 Travis St Ste 1400  
Houston TX 77002-3253 or Phone Number 866-777-5158

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**

No payment or response required.

**Due Date**

November 27, 2023

**Amount Due**

NONE

**With Late Charge**

NONE



**Billing Summary for Service to:**

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
11/02/2023 to 12/04/2023 (33 days)

**Actual Read Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State taxes totaling about \$0.97.

**Past Bill Information**

The balance on your last bill was ..... \$-897.95  
Payments ..... 0.00  
Amount due as of 12/07/2023 ..... -897.95

**Account Number**

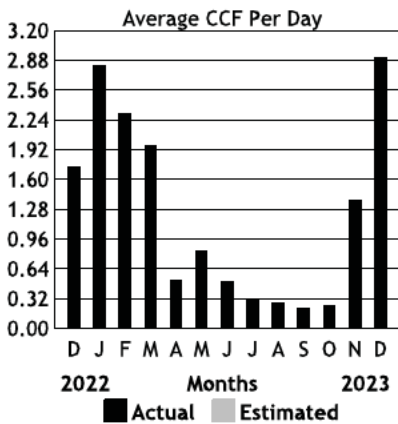
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (96 CCF at \$0.57900) ..... 55.58  
Distribution Charges (96 CCF at \$0.57896) ..... 55.58  
Weather Normalization Adjustment ..... 0.00  
Natural Gas System Improvement Charge ..... 3.41  
PA State Tax Surcharge ..... -0.06  
Current Charges ..... 129.51

**Utility charges owed this bill** ..... \$-768.44

**Current Bill Information - FRONTIER UTILITIES**  
FRONTIER UTILITIES natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... \$-768.44



Average	Last Year	This Year
CCF/Day	1.74	2.91
Daily Temperature	46° F	44° F

**Meter Information - Next Read Date January 08, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4750	4846	96

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [REDACTED] Rate Schedule: RT\_H

**Supplier Information**

■ FRONTIER UTILITIES  
601 Travis St Ste 1400  
Houston TX 77002-3253 or Phone Number 866-777-5158

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**

No payment or response required.

**Due Date**

December 28, 2023

**Amount Due**

NONE

**With Late Charge**

NONE



**Billing Summary for Service to:**



**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
12/05/2023 to 01/04/2024 (31 days)

**Actual Read Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009  
\*Your current UGI charges include State taxes totaling about \$1.02.

**Past Bill Information**

The balance on your last bill was ..... \$-768.44  
Payments ..... 0.00  
Amount due as of 01/09/2024 ..... -768.44

**Account Number**



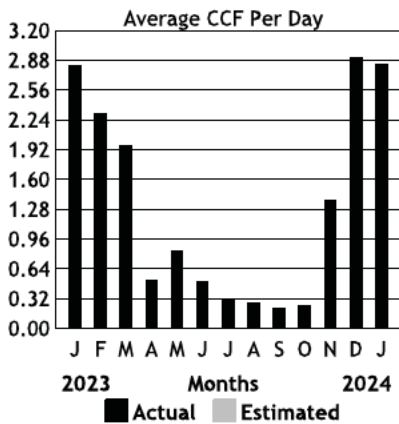
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (88 CCF at \$0.57900) ..... 50.95  
Distribution Charges (88 CCF at \$0.58080) ..... 51.11  
Weather Normalization Adjustment ..... 7.77  
Natural Gas System Improvement Charge ..... 3.69  
PA State Tax Surcharge ..... -0.07  
Current Charges ..... 128.45

**Utility charges owed this bill** ..... \$-639.99

**Current Bill Information - FRONTIER UTILITIES**  
FRONTIER UTILITIES natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... \$-639.99



Average	Last Year	This Year
CCF/Day	2.82	2.84
Daily Temperature	36°F	41°F

**Meter Information - Next Read Date February 06, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[Redacted]	4846	4934	88

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [Redacted] Rate Schedule: RT\_H

**Supplier Information**

■ FRONTIER UTILITIES  
601 Travis St Ste 1400  
Houston TX 77002-3253 or Phone Number 866-777-5158

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**



No payment or response required.

**Due Date**  
January 30, 2024

**Amount Due**

NONE

**With Late Charge**

NONE





**Billing Summary for Service to:**

[Redacted]

**Rate Classification (R):**

Residential Heating

**Billing Period:**

01/05/2024 to 02/02/2024 (29 days)

Actual Read

**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$1.73.

**Past Bill Information**

The balance on your last bill was ..... \$-639.99  
Payments ..... 0.00  
Amount due as of 02/07/2024 ..... -639.99

**Account Number**

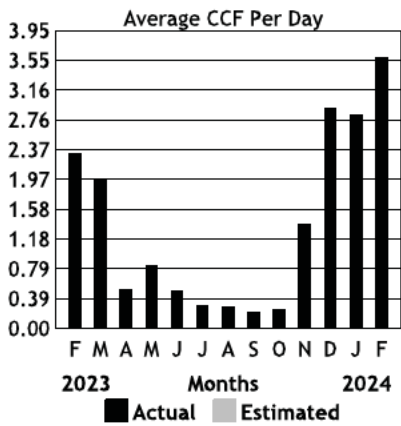
[Redacted]

**Current Bill Information**

Customer Charge ..... 15.00  
Commodity Charge (104 CCF at \$0.45335) ..... 47.15  
Distribution Charges (104 CCF at \$0.58067) ..... 60.39  
Weather Normalization Adjustment ..... 5.69  
Natural Gas System Improvement Charge ..... 4.14  
PA State Tax Surcharge ..... -0.12  
Current Charges ..... 132.25

**Utility charges owed this bill** ..... **\$-507.74**

**Credit Balance to be applied to next bill** ..... **\$-507.74**



Average	Last Year	This Year
CCF/Day	2.31	3.59
Daily Temperature	39° F	35° F

**Meter Information - Next Read Date March 07, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[Redacted]	4934	5038	104

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [Redacted] Rate Schedule: R\_H

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**

[Redacted]

No payment or response required.

**Due Date**

February 28, 2024

**Amount Due**

NONE

**With Late Charge**

NONE

[Redacted]

[Redacted]



**Billing Summary for Service to:**

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
02/03/2024 to 03/05/2024 (32 days)  
Actual Read

**Questions?**  
Call (800) 276-2722 or write to UGI at  
PO Box 13009  
Reading, PA 19612-3009  
\*Your current UGI charges include State  
taxes totaling about \$0.79.

**Past Bill Information**

The balance on your last bill was ..... \$-507.74  
Payments ..... 0.00  
Amount due as of 03/07/2024 ..... -507.74

**Account Number**

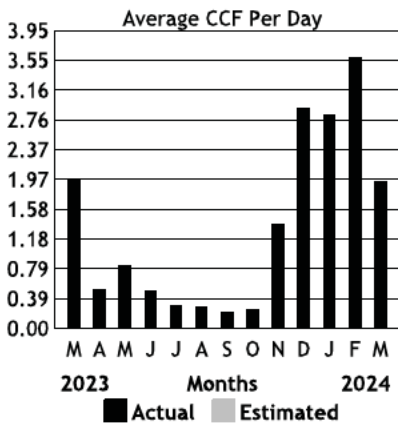
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (62 CCF at \$0.43000) ..... 26.66  
Distribution Charges (62 CCF at \$0.58048) ..... 35.99  
Weather Normalization Adjustment ..... 6.21  
Natural Gas System Improvement Charge ..... 2.86  
PA State Tax Surcharge ..... -0.05  
Current Charges ..... 86.67

**Utility charges owed this bill** ..... \$-421.07

**Current Bill Information - RELIANT ENERGY NORTHEAST LLC**  
RELIANT ENERGY NORTHEAST LLC natural gas costs are shown in the  
supplier charges above.

**Credit Balance to be applied to next bill** ..... \$-421.07



Average	Last Year	This Year
CCF/Day	1.97	1.94
Daily Temperature	41° F	40° F

**Meter Information - Next Read Date April 08, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	5038	5100	62

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [REDACTED] Rate Schedule: RT\_H

**Supplier Information**

■ RELIANT ENERGY NORTHEAST LLC  
PO Box 38781  
PHILADELPHIA PA 19104 or Phone Number 855-500-8703

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**

No payment or response required.

**Due Date**

March 28, 2024

**Amount Due**

NONE

**With Late Charge**

NONE



**Billing Summary for Service to:**

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
03/06/2024 to 04/04/2024 (30 days)  
Actual Read

**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State taxes totaling about \$0.39.

**Past Bill Information**

The balance on your last bill was ..... \$-421.07  
Payments ..... 0.00  
Amount due as of 04/08/2024 ..... -421.07

**Account Number**

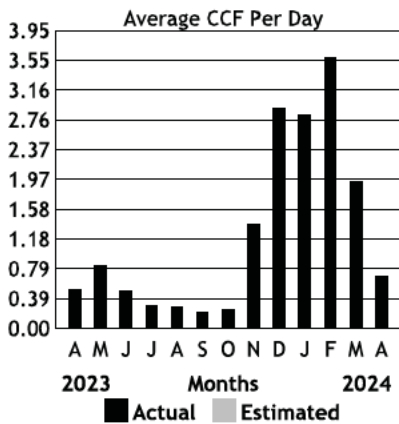
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (21 CCF at \$0.43000) ..... 9.03  
Distribution Charges (21 CCF at \$0.57952) ..... 12.17  
Weather Normalization Adjustment ..... 1.55  
Natural Gas System Improvement Charge ..... 1.44  
PA State Tax Surcharge ..... -0.03  
Current Charges ..... 39.16

**Utility charges owed this bill** ..... **\$-381.91**

**Current Bill Information - RELIANT ENERGY NORTHEAST LLC**  
RELIANT ENERGY NORTHEAST LLC natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... **\$-381.91**



Average	Last Year	This Year
CCF/Day	0.52	0.70
Daily Temperature	44° F	47° F

**Meter Information - Next Read Date May 07, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	5100	5121	21

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [REDACTED] Rate Schedule: RT\_H

**Supplier Information**

■ RELIANT ENERGY NORTHEAST LLC  
PO Box 38781  
PHILADELPHIA PA 19104 or Phone Number 855-500-8703

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**

No payment or response required.

**Due Date**

April 29, 2024

**Amount Due**

NONE

**With Late Charge**

NONE



**Billing Summary for Service to:**



**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
04/05/2024 to 05/03/2024 (29 days)  
Actual Read

**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State taxes totaling about \$0.22.

**Past Bill Information**

The balance on your last bill was ..... \$-381.91  
Payments ..... 0.00  
Amount due as of 05/07/2024 ..... -381.91

**Account Number**



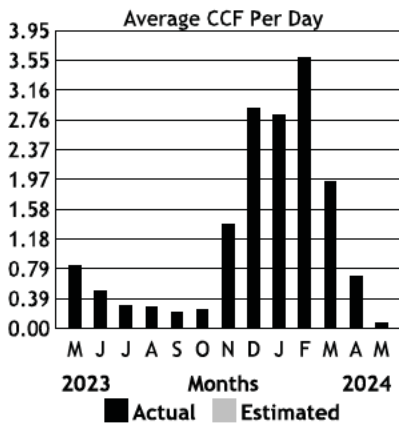
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (2 CCF at \$0.43000) ..... 0.86  
Distribution Charges (2 CCF at \$0.58000) ..... 1.16  
Weather Normalization Adjustment ..... 0.00  
Natural Gas System Improvement Charge ..... 0.81  
PA State Tax Surcharge ..... -0.02  
Current Charges ..... 17.81

**Utility charges owed this bill** ..... \$-364.10

**Current Bill Information - RELIANT ENERGY NORTHEAST LLC**  
RELIANT ENERGY NORTHEAST LLC natural gas costs are shown in the supplier charges above.

**Credit Balance to be applied to next bill** ..... \$-364.10



Average	Last Year	This Year
CCF/Day	0.83	0.07
Daily Temperature	57° F	58° F

**Meter Information - Next Read Date June 06, 2024**

Meter Number	Previous Reading	Present Reading	CCF Used
[Redacted]	5121	5123	2

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [Redacted] Rate Schedule: RT\_H

**Supplier Information**

■ RELIANT ENERGY NORTHEAST LLC  
PO Box 38781  
PHILADELPHIA PA 19104 or Phone Number 855-500-8703

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



**UGI Utilities, Inc.**  
PO Box 15503  
Wilmington, DE 19886-5503

**Account Number**



No payment or response required.

**Due Date**

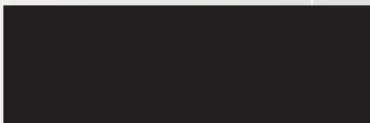
May 28, 2024

**Amount Due**

NONE

**With Late Charge**

NONE



**UGI Gas Exhibit 4**  
UGI Utilities, Inc. – Gas Division  
**Docket No. C-2023-3038563**



Provide a comprehensive summary of the Company’s WNA experience to date.

Response:

The Company’s Weather Normalization Adjustment (WNA) Rider was filed with and approved by the Commission as a five-year pilot program as part of the Company’s most recent base rate case in Docket No. R-2021-3030218. The WNA became effective October 29, 2022.

WNA is a method of billing distribution charges based on normal weather approved by the Commission. The WNA rider is a ratemaking mechanism which allows the Company to better align distribution rate recovery with the level of distribution revenues authorized in the Company’s base rate proceeding by addressing, in large part, the shortfall or excess revenue against the Company’s revenue requirement caused by a difference between the Normal Heating Degree Days built into the approved Commission rates and the Actual Heating Degree Days experienced during the winter months. These past two winters have been amongst the warmest in Company history when measured against the Company’s 15 year weather normal. The table below contains actual weather experienced over the past two years following the approval of WNA.

	Normal Heating Degree Days*	Actual Heating Degree Days*	
November 2022 - May 2023	5,089	4,324	15% Warmer than Normal
October 2023 - May 2024	5,471	4,560	17% Warmer than Normal

*\*UGI Total System Composite*

Since the approval of WNA, over the past two years, the Company has recovered \$75.0 million in distribution charges through the WNA rider; \$34.3 million during the 2022-2023 season and \$40.7 million during the 2023-2024 season. It should be noted that this rider does not completely offset the total impact of variation to normal weather on distribution revenue due to the application of a 3% deadband. Despite the overall significantly warmer than normal weather over the past two winters, the Company has still credited customers \$0.7 million in distribution charges due to certain billing periods within the UGI Gas territory having experienced colder than normal weather on an actual basis; these credit amounts will increase further during periods where weather is closer to normal conditions.

The Company is required to file Weather Normalization Adjusting Pilot Reports to the Commission bi-annually per terms of the most recent rate case order that approved the WNA pilot program. Attached are copies of the three reports prepared to date.

**UGI Utilities, Inc. - Gas Division**  
**Weather Normalization Adjustment Pilot Reporting**  
For the period of 11/1/22 - 3/31/23

<b>Rate Schedules</b>	<b>Reporting Item</b>	<b>2022 NOV</b>	<b>2022 DEC</b>	<b>2023 JAN</b>	<b>2023 FEB</b>	<b>2023 MAR</b>	<b>Total</b>
R/RT and N/NT	Total Number of Bills	657,849	690,784	702,630	637,191	757,680	3,446,134
R/RT and N/NT	Number of Bills with WNA	494,845	335,446	609,401	605,795	709,080	2,754,567
R/RT and N/NT	Billed WNA Volume Adj (ccf)	3,349,172	2,246,101	13,453,826	24,268,267	20,479,847	63,797,213
R/RT and N/NT	Billed WNA Revenue Adj (\$)	\$ 1,536,159	\$ 1,021,184	\$ 6,152,516	\$ 10,999,357	\$ 9,194,818	\$ 28,904,034
R/RT	Total Number of Bills	591,744	621,057	631,170	573,018	680,250	3,097,239
R/RT	Number of Bills with WNA	447,992	301,310	550,669	547,011	639,252	2,486,234
R/RT	Billed WNA Volume Adj (ccf)	2,153,568	1,439,549	8,647,924	15,124,980	12,723,261	40,089,282
R/RT	Billed WNA Revenue Adj (\$)	\$ 1,080,819	\$ 716,506	\$ 4,334,131	\$ 7,543,041	\$ 6,319,132	\$ 19,993,629
N/NT	Total Number of Bills	66,105	69,727	71,460	64,173	77,430	348,895
N/NT	Number of Bills with WNA	46,853	34,136	58,732	58,784	69,828	268,333
N/NT	Billed WNA Volume Adj (ccf)	1,195,604	806,552	4,805,902	9,143,287	7,756,586	23,707,930
N/NT	Billed WNA Revenue Adj (\$)	\$ 455,340	\$ 304,678	\$ 1,818,385	\$ 3,456,316	\$ 2,875,687	\$ 8,910,405
<b>Region</b>	<b>Reporting Item</b>	<b>2022 NOV</b>	<b>2022 DEC</b>	<b>2023 JAN</b>	<b>2023 FEB</b>	<b>2023 MAR</b>	<b>Total</b>
UGI Gas - Central	Calendar Month - Normal Heating Degree Days	692	987	1,166	998	858	4,701
UGI Gas - Central	Calendar Month - Actual Heating Degree Days	594	982	846	800	791	4,013
UGI Gas - North	Calendar Month - Normal Heating Degree Days	837	1,130	1,313	1,154	1,027	5,461
UGI Gas - North	Calendar Month - Actual Heating Degree Days	725	1,088	1,001	878	942	4,634
UGI Gas - South	Calendar Month - Normal Heating Degree Days	632	905	1,066	911	744	4,258
UGI Gas - South	Calendar Month - Actual Heating Degree Days	555	933	775	701	673	3,637
UGI Gas - West	Calendar Month - Normal Heating Degree Days	781	1,067	1,230	1,056	896	5,030
UGI Gas - West	Calendar Month - Actual Heating Degree Days	712	1,102	948	823	876	4,461

**UGI Utilities, Inc. - Gas Division**  
**Weather Normalization Adjustment Pilot Reporting**  
For the period of 4/1/23 - 10/31/23

<b>Rate Schedules</b>	<b>Reporting Item</b>	<b>2023 APR</b>	<b>2023 MAY</b>	<b>2023 JUN<sup>1</sup></b>	<b>2023 JUL<sup>1</sup></b>	<b>2023 AUG<sup>1</sup></b>	<b>2023 SEP<sup>1</sup></b>	<b>2023 OCT</b>	<b>Total</b>
R/RT and N/NT	Total Number of Bills	644,611	723,767	679,115	672,095	750,421	666,627	712,202	4,848,838
R/RT and N/NT	Number of Bills with WNA	588,357	503,561	5,354	72	5	15	211,543	1,308,907
R/RT and N/NT	Billed WNA Volume Adj (ccf)	9,423,344	1,105,684	(18,930)	666	(1,037)	1,221	568,839	11,079,786
R/RT and N/NT	Billed WNA Revenue Adj (\$)	\$ 4,311,784	\$ 487,940	\$ (7,892)	\$ 22	\$ (393)	\$ 454	\$ 258,355	\$ 5,050,270
R/RT	Total Number of Bills	580,105	650,634	610,673	604,474	673,177	598,915	640,299	4,358,277
R/RT	Number of Bills with WNA	532,148	455,315	4,668	64	1	14	187,839	1,180,049
R/RT	Billed WNA Volume Adj (ccf)	6,098,139	566,866	(6,314)	(1,579)	19	(99)	324,373	6,981,405
R/RT	Billed WNA Revenue Adj (\$)	\$ 3,049,904	\$ 283,485	\$ (3,158)	\$ (790)	\$ 10	\$ (50)	\$ 164,836	\$ 3,494,238
N/NT	Total Number of Bills	64,506	73,133	68,442	67,621	77,244	67,712	71,903	490,561
N/NT	Number of Bills with WNA	56,209	48,246	686	8	4	1	23,704	128,858
N/NT	Billed WNA Volume Adj (ccf)	3,325,205	538,818	(12,616)	2,245	(1,057)	1,320	244,467	4,098,381
N/NT	Billed WNA Revenue Adj (\$)	\$ 1,261,880	\$ 204,455	\$ (4,735)	\$ 812	\$ (402)	\$ 504	\$ 93,519	\$ 1,556,032

<sup>1</sup> All WNA activity during these revenue months were related to billing periods that ended within the WNA period through 5/31/23, but the related invoices posted on or after 6/1/23. This activity also includes any cancel and rebills for prior periods that occurred during these months.

<b>Region</b>	<b>Reporting Item</b>	<b>2023 APR</b>	<b>2023 MAY</b>	<b>2023 JUN</b>	<b>2023 JUL</b>	<b>2023 AUG</b>	<b>2023 SEP</b>	<b>2023 OCT</b>	<b>Total</b>
UGI Gas - Central	Calendar Month - Normal Heating Degree Days	447	181	35	3	10	96	376	1,148
UGI Gas - Central	Calendar Month - Actual Heating Degree Days	341	206	51	-	5	107	320	1,030
UGI Gas - North	Calendar Month - Normal Heating Degree Days	605	303	104	42	65	202	523	1,844
UGI Gas - North	Calendar Month - Actual Heating Degree Days	459	299	111	8	32	159	407	1,475
UGI Gas - South	Calendar Month - Normal Heating Degree Days	365	130	11	-	2	54	306	868
UGI Gas - South	Calendar Month - Actual Heating Degree Days	273	129	6	-	-	47	261	716
UGI Gas - West	Calendar Month - Normal Heating Degree Days	498	220	54	13	26	147	453	1,411
UGI Gas - West	Calendar Month - Actual Heating Degree Days	423	249	80	1	18	144	408	1,323

**UGI Utilities, Inc. - Gas Division**  
**Weather Normalization Adjustment Pilot Reporting**  
For the period of 11/1/23 - 3/31/24

<b>Rate Schedules</b>	<b>Reporting Item</b>	<b>2023 NOV</b>	<b>2023 DEC</b>	<b>2024 JAN</b>	<b>2024 FEB</b>	<b>2024 MAR</b>	<b>Total</b>
R/RT and N/NT	Total Number of Bills	673,107	669,970	724,592	681,980	682,512	3,432,161
R/RT and N/NT	Number of Bills with WNA	456,224	460,215	681,099	645,482	646,595	2,889,615
R/RT and N/NT	Billed WNA Volume Adj (ccf)	2,700,175	4,775,793	17,463,903	19,299,656	25,201,442	69,440,969
R/RT and N/NT	Billed WNA Revenue Adj (\$)	\$ 1,280,999	\$ 2,267,281	\$ 8,167,157	\$ 9,077,681	\$ 11,847,340	\$ 32,640,457
R/RT	Total Number of Bills	605,796	602,536	651,291	613,382	613,650	3,086,655
R/RT	Number of Bills with WNA	412,231	413,761	614,798	583,134	583,894	2,607,818
R/RT	Billed WNA Volume Adj (ccf)	1,828,070	3,242,561	10,942,912	12,481,667	16,251,546	44,746,756
R/RT	Billed WNA Revenue Adj (\$)	\$ 946,337	\$ 1,678,848	\$ 5,664,520	\$ 6,461,106	\$ 8,412,549	\$ 23,163,360
N/NT	Total Number of Bills	67,311	67,434	73,301	68,598	68,862	345,506
N/NT	Number of Bills with WNA	43,993	46,454	66,301	62,348	62,701	281,797
N/NT	Billed WNA Volume Adj (ccf)	872,105	1,533,232	6,520,991	6,817,989	8,949,897	24,694,213
N/NT	Billed WNA Revenue Adj (\$)	\$ 334,662	\$ 588,432	\$ 2,502,636	\$ 2,616,575	\$ 3,434,791	\$ 9,477,097

<b>Region</b>	<b>Reporting Item</b>	<b>2023 NOV</b>	<b>2023 DEC</b>	<b>2024 JAN</b>	<b>2024 FEB</b>	<b>2024 MAR</b>	<b>Total</b>
UGI Gas - Central	Calendar Month - Normal Heating Degree Days	692	987	1,166	1,031	858	4,734
UGI Gas - Central	Calendar Month - Actual Heating Degree Days	724	786	1,026	860	648	4,044
UGI Gas - North	Calendar Month - Normal Heating Degree Days	837	1,130	1,313	1,193	1,027	5,500
UGI Gas - North	Calendar Month - Actual Heating Degree Days	773	843	1,133	920	754	4,423
UGI Gas - South	Calendar Month - Normal Heating Degree Days	632	905	1,066	941	744	4,288
UGI Gas - South	Calendar Month - Actual Heating Degree Days	647	728	944	771	559	3,649
UGI Gas - West	Calendar Month - Normal Heating Degree Days	781	1,067	1,230	1,091	896	5,065
UGI Gas - West	Calendar Month - Actual Heating Degree Days	691	763	1,052	879	675	4,060

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Docket No. C-2023-3038563**

**Bhavin Patel  
v.  
UGI Utilities, Inc – Gas Division**

**Statement No. 1R**

**Rebuttal Testimony**

**of**

**John D. Taylor, Managing Partner  
Atrium Economics, LLC**

**Topics Addressed:           Design of the Weather Normalization  
Adjustment Rider**

**Dated: September 25, 2023**

1 **Rebuttal Testimony of John D. Taylor**

2 **I. INTRODUCTION**

3 **Q. Please state your name, affiliation, and business address.**

4 A. My name is John D. Taylor, and I am employed by Atrium Economics, LLC (“Atrium  
5 Economics” or “Atrium”) as a Managing Partner. My business address is 10 Hospital  
6 Center Commons, Suite 400, Hilton Head Island, SC 29926.

7  
8 **Q. On whose behalf are you testifying?**

9 A. I am testifying on behalf of UGI Utilities, Inc. – Gas Division (“UGI Gas” or the  
10 “Company”).

11  
12 **Q. Please describe your professional background and education.**

13 A. As a utility pricing and policy expert, I support various energy and utility related projects  
14 regarding economics, finance, and public policy. In the public utility space, I have assisted  
15 with asset divestitures, allocated class cost of service studies, rate of return calculations,  
16 cash working capital impacts, tax litigation, revenue allocation, rate design, auction  
17 analysis, and affiliate cost allocation. I have reviewed and analyzed these subject matters  
18 considering the accounting treatment, financial investment, and operational configuration  
19 of a company’s assets. For utility rate cases, I have performed: allocated class cost of  
20 service studies, revenue allocation, rate design, valuation modeling, affiliate cost  
21 allocation, and various cost of service analyses. Also, I have filed testimony on class cost  
22 of service studies, return on equity, and statistical audit sampling. Specifically, I have  
23 presented expert testimony in Indiana, Maine, Massachusetts, Minnesota, New

1 Hampshire, North Carolina, Illinois, Delaware, Pennsylvania, South Carolina,  
2 Washington, Florida, West Virginia, Alberta, British Columbia, Ontario, and before the  
3 Federal Energy Regulatory Commission (“FERC”). Regarding my educational  
4 background and professional background, I studied electrical and mechanical engineering  
5 and worked for an industrial inspection company, which provided hands-on experience  
6 with electric utility assets and equipment. I received an undergraduate degree in  
7 Environmental Economics, with an emphasis in econometrics and regulatory policy. I also  
8 earned a Masters in Economics from American University in Washington, DC. A copy of  
9 my resume is provided as UGI Gas Exhibit JDT-1R.

10

11 **Q. Mr. Taylor, have you previously testified before the Pennsylvania Public Utility  
12 Commission (“Commission”)?**

13 A. Yes. I have presented expert testimony before the Commission in several cases, including  
14 the UGI Gas base rate proceeding at Docket No. R-2021-3030218 where the Commission  
15 approved UGI Gas’s use of the Weather Normalization Adjustment (“WNA”).

16

17 **Q. Please summarize the content of your testimony.**

18 A. I will present the Company’s WNA mechanism, which is designed to stabilize distribution  
19 revenues and customer bills for certain heating sensitive rate classes from experienced  
20 weather variability. My testimony consists of (a) the rationale for the WNA mechanism,  
21 (b) a summary of UGI Gas’s WNA, (c) detailed components of UGI Gas’s WNA, and (d)  
22 a summary of weather normalization adjustments used in Pennsylvania and across the U.S.

23

1 Q. **Was UGI Gas's WNA approved by the Commission?**

2 A. Yes, it was. The Commission approved the Company's WNA by Order entered September  
3 15, 2022. As stated in UGI Gas's witness Bassininsky's Rebuttal Testimony, *see* UGI Gas  
4 Statement No. 2R, the Commission approved the WNA as a five-year pilot program, and  
5 the WNA became effective on October 29, 2022.

6

7 Q. **Was much consideration given to UGI Gas's request to implement a WNA as part of  
8 its most recent base rate case at Docket No. R-2021-3030218?**

9 A. Yes. Ratemaking issues are heavily contested in base rate proceedings, with many parties,  
10 including, but not limited to, the Commission's Bureau of Investigation and Enforcement,  
11 the Pennsylvania Office of Consumer Advocate, the Pennsylvania Office of Small  
12 Business Advocate, and the Pennsylvania Public Utility Law Project, arguing against  
13 proposed increases to the rates charged to various customer classes, including residential  
14 customers like Mr. Patel. Ultimately, the parties in the 2022 base rate case, including those  
15 representing the interests of residential and low-income customers, reached a full  
16 settlement that the Commission approved. With regard to the WNA, specifically, in  
17 addition to testimony filed by the Company and the parties on the adoption of and structure  
18 of the WNA, UGI Gas also answered many discovery requests from the parties as they  
19 investigated the Company's proposal.

20

21 Q. **What Exhibits are you sponsoring in this proceeding?**

22 A. I am sponsoring the following Exhibits:

23 

- UGI Gas Exhibit JDT-1R, Resume; and

- UGI Gas Exhibit JDT-2R, Survey of WNA Mechanisms.

**II. RATIONALE FOR A WNA MECHANISM**

**Q. What is the purpose of the WNA?**

A. Utilities establish distribution rates that are set to recover their authorized revenues, and these distribution rates are comprised of volumetric charges. While gas distribution utilities' cost structure is fixed and does not vary with the amount of gas consumed by customers; the rates for recovery of these fixed costs are set on a volumetric basis. The result is customers are billed more when it is colder-than-normal and less when it is warmer-than-normal; which does not reflect the fixed nature of costs to provide distribution service to these customers. While customers pay more as they consume more natural gas, they are not provided with additional distribution services as they consume more; nor do they receive less distribution services when they consume less. When the weather is colder than normal, customers use more gas but do not purchase more gas distribution service. They do not get more metering, capacity, main footage, service lines, billing, and customer service; they get the same level of distribution service. When the weather is warmer than normal, customers use less gas, but they do not purchase less of these services. As further described below these volumetric rates are set to match customers' contributions to these fixed costs, with the Company's recovery of these costs when the weather is normal. Where actual weather deviates from the normal weather used to design the volumetric distribution rates, the utility will either under or over recover the level of distribution revenues approved by the Commission and customers will either over or under pay for these services. The WNA is a way to adjust customer bill calculations to

1 better align the cost recovery the Commission allows with the distribution revenues the  
2 utility receives.

3

4 **Q. How does weather influence the recovery of costs for a gas utility and costs to**  
5 **customers?**

6 A. Weather-normalized gas volumes play a crucial role in determining a utility's base rates  
7 for gas service. In a base rate proceeding, the utility calculates its volumetric unit rates by  
8 dividing the expected costs to be covered through volumetric rates by the projected  
9 weather-normalized gas sales volumes. These rates are designed to enable the utility to  
10 recover its authorized revenue requirement under typical weather conditions. However,  
11 because actual weather conditions rarely align with these normalized conditions, there is  
12 often a discrepancy between the recovery of actual costs and those based on the  
13 normalized weather conditions. When temperatures are normal, the utility has a better  
14 chance of recovering its fixed costs, and customers' payments reflect the actual costs of  
15 service. However, normal temperatures are infrequent, leading to variations in revenue  
16 collection each year. During warmer weather, the utility may under-recover its costs,  
17 necessitating cost management efforts to maintain financial stability. Conversely, colder  
18 weather leads to higher bills for customers, potentially burdening customers with  
19 increased costs above the cost of providing distribution service. This dynamic creates a  
20 risk of customers overpaying during cold periods and the utility under-recovering during  
21 warm periods. Therefore, because of abnormal weather and a rate design that is based, in  
22 substantial part, on customer usage, the amount of distribution revenue (i.e., non-gas sales

1 revenues and non-reconcilable surcharge revenues) collected from customers can vary  
2 widely from the revenue requirement level authorized by the regulator.

3

4 **Q. What portion of UGI Gas’s fixed costs is recovered through its current volumetric  
5 distribution charges?**

6 A. Approximately 64% of distribution revenues for Rates R and RT is recovered through the  
7 volumetric distribution charge. For UGI Gas’s small commercial customers receiving  
8 service under Rates N and NT, approximately 83% of distribution revenue is recovered  
9 through the volumetric distribution charge.

10

11 **III. UGI GAS’S WNA MECHANISM**

12 **Q. Please define and describe the concept of a WNA mechanism.**

13 A. UGI Gas’s distribution rates, which are set to allow the utility to recover its authorized  
14 level of distribution revenues, are based on expected throughput during normal weather.  
15 When actual weather deviates from normal weather, there will be a difference between  
16 actual and projected distribution revenues. A WNA mechanism adjusts a customer’s bill  
17 due to these variations from normal weather (i.e., temperature variations or heating degree  
18 day variations) in order to have the bill reflect normal weather conditions. For billing  
19 periods that are colder than normal, a credit will be applied to the bill. For billing periods  
20 that are warmer than normal, a surcharge is applied to the bill. WNA mechanisms are  
21 typically effective for usage during the heating season calendar months (e.g., UGI Gas’s  
22 is effective October through May). WNAs reduce the amount of variation in both customer

1 bills and utility revenues by making a compensating adjustment for the difference between  
2 actual weather and normal weather.

3

4 **Q. Do WNA mechanisms differ in their design?**

5 A. Yes. Gas utilities typically use two types of WNA mechanisms: (1) a mechanism that  
6 adjusts current billings on a monthly billing basis as the bill is being calculated and issued;  
7 and (2) a mechanism that adjusts billings on a lagged basis where the adjustment appears  
8 on the customer's bill(s) from a few to several months after a variation from normal  
9 weather is experienced.

10

11 **Q. Which type of WNA mechanism does UGI Gas utilize?**

12 A. The Company utilizes a WNA mechanism that adjusts billings on a monthly billing basis  
13 as the bill is being calculated and issued.

14

15 **Q. Why has the Company adopted a WNA mechanism of this type?**

16 A. UGI Gas chose this type of WNA mechanism because, by adjusting current billings on a  
17 monthly billing basis, the customer can more readily link the resulting billing adjustment  
18 with the weather causing the adjustment. In a cold winter with high gas bills, customers  
19 will receive the benefits of WNA bill reductions more quickly. The monthly bills will  
20 reflect the specific period in which the colder weather occurs. In addition, the utility's  
21 financial statements will reflect the cash flow effect of the monthly billing WNA  
22 mechanism sooner than a lagged WNA mechanism.

23

1 **Q. Please describe the Company's WNA.**

2 A. The key elements of the Company's WNA mechanism are as follows:

- 3 • It applies to UGI Gas's Residential customers receiving service under Rates R and  
4 RT and UGI Gas's Non-Residential customers served under Rates N and NT.
- 5 • It adjusts billings on a current monthly basis and uses adjustment factors which are  
6 representative of each customer's consumption characteristics.
- 7 • It is effective for the billing months of October through May.
- 8 • It adjusts the amount billed to each customer to offset the impact of actual heating  
9 degree days ("AHDD") variations from normal heating degree days ("NHDD").
- 10 • It utilizes a 3% deadband such that the mechanism only applies if the variation of  
11 actual weather is greater than 3% of normal weather for a particular month.

12  
13 **Q. What are the benefits of the weather normalization adjustment mechanism for UGI  
14 Gas and its customers?**

15 A. For an applicable customer, a WNA is advantageous because:

- 16 1. It reflects the actual costs of providing distribution service for each customer. It  
17 better aligns the charges to each customer with the cost to serve each customer  
18 within a particular rate class.
- 19 2. It reduces bill variability due to weather in the month when the variation occurs and  
20 provides bill relief in severely cold months.
- 21 3. The WNA provides more stable annual bill amounts and mitigates volatility in  
22 monthly gas bills. This helps customers budget for and pay their bills. Stable bills  
23 also help improve customer satisfaction.

- 1           4. Customers continue to benefit from their energy conservation efforts, as the actual  
2           usage on each customer's bill is utilized to calculate the WNA adjustment, and that  
3           usage level reflects the conservation behaviors of each customer.

4  
5           For UGI Gas, a WNA is a fair and equitable rate mechanism because:

- 6           1. UGI Gas's volumetric delivery service rates are based on the volumes of gas it  
7           expects to sell under normal weather conditions. The WNA mechanism improves  
8           the ability to match the level of distribution revenues, established to recover fixed  
9           costs, with the amount reflected in the monthly customer billings.
- 10          2. Deviations from normal weather can result in differences in actual and projected  
11          recovery of the Company's annual non-gas distribution costs when actual weather  
12          experienced is colder or warmer than normal, respectively. Therefore, such  
13          deviations can produce erratic financial results for the Company.

14  
15   **IV. COMPONENTS OF UGI GAS'S WNA MECHANISM**

16   **Q.    Please explain how UGI Gas's WNA mechanism operates.**

17   A.    UGI Gas's WNA mechanism adjusts the amount billed to each customer served under  
18   Rates R, RT, N, and NT to effectively weather normalize distribution revenues recovered  
19   from these two rate schedules during the cold weather heating season. It is a customer  
20   specific calculation applied to monthly billing cycles during the months of October  
21   through May.

1 **Q. What is the Company’s basis for determining normal weather for its Pennsylvania**  
2 **gas distribution system?**

3 A. Since 2009, UGI Gas has defined normal weather as the average annual heating degree  
4 days (“HDD”) calculated for a 15-year period, with the most recent period ending  
5 December 31, 2019. It is updated every 5 years with the next recalculation due for the  
6 period ending December 31, 2024.

7

8 **Q. Are the adjustments to customers’ bills calculated on a calendar month or on a billing**  
9 **cycle month basis?**

10 A. The customer adjustments are made on a billing cycle basis. This approach allows the  
11 adjustments to be calculated at the end of each customer’s meter reading billing cycle and  
12 incorporated into the original bill sent to each customer. This approach provides for an  
13 accurate and timely adjustment for each customer. There is no additional time lag between  
14 when the customer experiences the bill variability and when the weather normalizing  
15 adjustment is made.

16

17 **Q. In the context of WNA riders, what are deadbands?**

18 A. A deadband applies to WNA riders such that the adjustment is not triggered if AHDD are  
19 within a certain threshold of the NHDD. Thus, no adjustment applies to the bill if the  
20 experienced weather causes usage that falls within the identified deadband threshold. The  
21 deadband ultimately causes some weather variability to flow to customer bills and the  
22 associated utility distribution revenues those bills generate.

23

1 **Q. Does UGI Gas’s WNA include a deadband?**

2 A. Yes. The Company’s WNA employs a 3% deadband. This means that if the customer’s  
3 AHDD are within either 3% higher or 3% lower than the weather NHDD, the customer’s  
4 bill will not reflect a WNA.

5

6 **V. THERE IS WIDESPREAD INDUSTRY USE OF WNA MECHANISMS**

7 **Q. Are WNA mechanisms like the one the Company adopted widely accepted in the**  
8 **natural gas industry?**

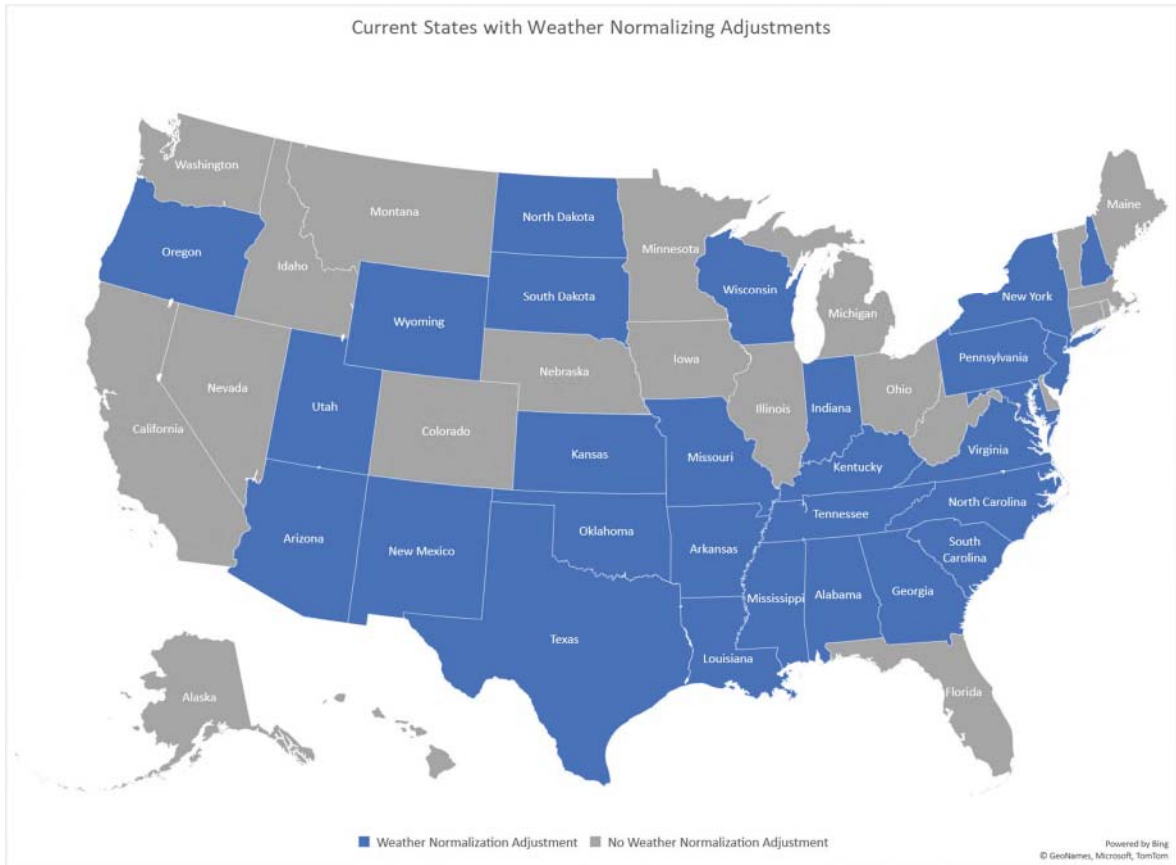
9 A. Yes. UGI Gas Exhibit JDT-2 presents a survey conducted by Atrium Economics, with  
10 input from an American Gas Association survey,<sup>1</sup> which shows that many U.S. gas utilities  
11 across a wide geographic area have implemented WNA mechanisms. Specifically, the  
12 survey results (provided in Figure 1 below) show that, as of February 2023, there are 27  
13 states that have approved WNAs for gas companies serving 69 different service territories.  
14 In addition, in recent years, other jurisdictions have reviewed WNA proposals before their  
15 respective regulatory commissions, which indicates that the number of utilities using  
16 WNAs continues to grow.

---

<sup>1</sup> Atrium supplements the most recently available AGA survey (dated December 2016) with its own research on WNA tariffs and rate orders. Atrium’s research was most recently reviewed and updated in February 2023. The American Gas Association survey is titled “Innovative Rates, Non-Volumetric Rates, and Tracking Mechanisms: Current List – December 2016.”

1  
2

**Figure 1 – Map of US States with WNA Mechanisms**



3

4 **Q. Is UGI Gas’s WNA similar to other WNA mechanisms in place for gas distribution**  
5 **utilities in Pennsylvania?**

6 **A.** Yes, it is. For example, UGI Gas’s WNA shares similarities with Columbia Gas of  
7 Pennsylvania’s (“Columbia”) WNA rider.<sup>2</sup> The specific calculation of UGI Gas’s WNA  
8 rate is similar to the calculation of Columbia’s WNA rider.<sup>3</sup> Finally, like Columbia, UGI  
9 Gas has periodic reporting requirements for the WNA to the Commission.

---

<sup>2</sup> Columbia Gas of Pennsylvania, Inc., “Rider WNA – Weather Normalization Adjustment”, Rates and Rules for furnishing gas service, <https://www.columbiagaspa.com/docs/librariesprovider14/rates-and-tariffs/pennsylvania-tariff.pdf?sfvrsn=41>, pdf at page 187. The Company’s rider also shares similarities with the WNA used by Philadelphia Gas Works, “Weather Normalization Adjustment Clause”, Gas Service Tariff, [https://www.pgworks.com/uploads/pdfs/PGW\\_Gas\\_Service\\_Tariff\\_Through\\_Supplement\\_145.pdf](https://www.pgworks.com/uploads/pdfs/PGW_Gas_Service_Tariff_Through_Supplement_145.pdf), at page 150.

<sup>3</sup> There are a few differences in function. Specifically, Columbia uses a November through May heating season.

1

2 **Q. What has the Pennsylvania Commission said about the use of a WNA?**

3 A. When the Commission authorized the continuation of Columbia’s WNA mechanism,  
4 which had earlier been implemented on a pilot basis, Chairman Gladys Brown Dutrieuille,  
5 provided the following statement in the Order supporting the continuation of the WNA  
6 mechanism:

7 I commend the parties for their commitment to this mechanism. ... The  
8 Weather Normalization Adjustment works bi-directionally to insulate  
9 customers from high bills during the extremely cold months, while also  
10 limiting the decline in revenue for Columbia during unseasonably warm  
11 heating months. This...stabilizes Columbia’s cash flow, and in turn, allows  
12 Columbia to more acutely focus on operational items within its control;  
13 namely infrastructure upgrades and repairs. Further, since this decoupling  
14 mechanism is only applied to the distribution component of the bill, and  
15 not the natural gas commodity charge, incentives for efficient consumption  
16 are maintained.<sup>4</sup>  
17

18 **Q. Do you believe UGI Gas’s WNA mechanism is fair to both the Company and its**  
19 **customers?**

20 A. Yes. The WNA mechanism strikes an appropriate balance between the interests of both  
21 the Customer and the Company. UGI Gas bills its customers in a manner to reflect the  
22 actual weather conditions that underlie its Commission-authorized base rates on a monthly  
23 billing basis. The WNA mechanism provides the Company with a reasonable opportunity  
24 to earn its allowed rate of return on its investment and removes bill variability due to a  
25 factor outside of the customer’s control (i.e., variations in weather).

---

<sup>4</sup> See Pennsylvania Public Service Commission Docket No. R-2018-2647577.

1 **VI. CONCLUSION**

2 **Q. Please summarize how the WNA mechanism results in fair and equitable**  
3 **ratemaking.**

4 A. The Company's WNA mechanism results in fair and equitable ratemaking because:

- 5 • The WNA better aligns the interests of UGI Gas and its customers. The fixed costs  
6 embedded in UGI Gas's volumetric rates for distribution service do not vary in the  
7 short-term with changes in temperature.  
8
- 9 • The WNA addresses a factor beyond the Company's and customers' control,  
10 weather variability. This variability contributes to increased volatility in  
11 customers' bills and increased volatility in the Company's recovery of costs.  
12
- 13 • Customers receive greater stability in the non-gas portion of their utility bills, a  
14 benefit during the winter months when gas prices tend to be at their highest, and a  
15 particular benefit for low-income customers with high bills during the lengthy  
16 heating seasons in UGI Gas's service areas.

17

18 **Q. Does this conclude your rebuttal testimony?**

19 A. Yes, it does.

**UGI GAS**

**JDT-1R**



## John D. Taylor

### Managing Partner

Mr. Taylor has experience with a wide range of costing, ratemaking, and regulatory activities for gas and electric utilities. He has testified numerous times on these and other issues for clients across North America. He has extensive experience with costing and pricing rates and services, regulatory planning and strategy development, revenue recovery and tracking mechanisms, merger and acquisitions analysis, new product and service development, affiliate transaction reviews, line extension policies, market assessments, litigation support, and organizational and operations reviews. He has testified on numerous occasions as an expert witness on costing and ratemaking related issues on behalf of utilities before federal, state, and provincial regulatory bodies and has extensive experience in evaluating and implementing innovative ratemaking approaches and rate design concepts.

He has also testified on return on equity, electric vehicle and battery storage programs, time-of-use rates, and the appropriate use of statistical analysis during audit testing. Mr. Taylor has led engagements relating to gas supply planning and the review of midstream transportation and storage capacity resources. He has worked as the market monitor for New England ISO's capacity market, supported the negotiation of PPAs, and supported feasibility and prudence studies of generation investments. He has also been involved in selling generating assets, supporting due diligence efforts, financial analyses, and regulatory approval processes.

Mr. Taylor received a master's degree in Economics from American University and holds a bachelor's degree in Environmental Economics from the University of North Carolina at Asheville.

His consulting career includes Managing Partner with Atrium Economics, LLC; Principal Consultant – Advisory & Planning with Black & Veatch Management Consulting, LLC; Senior Project Manager & Principal of Concentric Energy Advisors, Inc.; and CEO of Nova Data Testing, Inc. Mr. Taylor started his career working on Capitol Hill working with NGOs that were seeking Public Private Partnerships with the Federal Government, World Bank, and International Monetary Fund to pursue various projects in developing countries.

#### EDUCATION

M.A., Economics, American University

B.A., Environmental Economics, University of North Carolina at Asheville

#### YEARS EXPERIENCE

17

#### RELEVANT EXPERTISE

Utility Costing and Pricing, Expert Witness Testimony, Transaction Facilitation, Revenue Requirements, Statistics, Valuation, Market Studies, Rate Case Management, New Product and Service Development, Strategic Business Planning, Marketing and Sales



## EXPERT WITNESS TESTIMONY PRESENTATION

### United States

- California – Superior Court of California
- Delaware Public Service Commission
- Florida Public Service Commission
- Federal Energy Regulatory Commission
- Illinois Commerce Commission
- Indiana Utility Regulatory Commission
- Maine Public Service Commission
- Massachusetts Department of Public Utilities
- Minnesota Public Utilities Commission
- New Hampshire Public Utilities Commission
- North Carolina Utilities Commission
- Oregon Public Utility Commission
- Pennsylvania Public Utility Commission
- Public Service Commission of South Carolina
- Virginia State Corporation Commission
- Washington Utilities and Transportation Commission

### Canada

- Alberta Utilities Commission
- British Columbia Utilities Commission
- Ontario Energy Board
- Public Service Commission of West Virginia

## REPRESENTATIVE EXPERIENCE

### **Rate Design and Regulatory Proceedings**

Mr. Taylor has worked on dozens of electric and gas rate cases including the development of revenue requirements, class cost of service studies, and projects related to utility rate design issues. Specifically, he has:

- Lead expert and witness for class costs of service studies across North America and worked on dozens of other class cost of service and rate design projects for other lead witnesses.
- Developed WNA mechanism for a gas utility including back casting results and supporting expert witness testimony and exhibits.
- Developed revenue requirement model to comply with a new performance-based formula ratemaking process for a Midwest electric utility.
- Supported the developed of time of use rates, demand rates, economic development rates, load retention rates, and line extension policies.
- Analyzed and summarized allocation methodology for a shared services company.
- Assessed the reasonableness of costs through various benchmarking efforts.
- Led the effort to collect and organize plant addition documentation for six Midwest utilities associated with the state commission's audit of rate base.
- Supported lead-lag analyses and testimonies.
- Analyzed customer usage profiles to support reclassification of rate classes for a gas utility.
- Helped conduct a marginal cost analysis to support rate design testimony.

### **Litigation Support and Expert Testimony**

Mr. Taylor has testified in several cases on class cost of service studies and statistical audit methods. He has also supported numerous other expert testimonies. Specifically, he has:



- Filed testimony as an expert witness on allocated class cost of service studies for both electric and gas utilities.
- Filed testimony as an expert witness on the application of statistical analysis.
- Filed testimony before FERC on the rate of return for an Annual Transmission Revenue Requirement and participated in FERC settlement conferences.
- Part of two-person expert witness team that provided an expert report to the British Columbia Utilities Commission on the use of facilities for transportation balancing services for Fortis BC.
- Part of two-person expert witness team that provided an expert report on affiliate transactions and capitalized overhead allocations for Hydro One on three separate occasions.
- Sole expert for expert report on affiliate allocations for Alectra utilities, the second largest publicly owned electric utility in North America. This was conducted shortly after the merger of four distinct utilities.
- Sole expert for expert report on the allocation of overhead costs between transmission and distribution businesses for EPCOR.

### **Transaction Experience**

Mr. Taylor has been involved with several generating asset transactions supporting both buy side and sell side analysis and due diligence. His work has included:

- Worked as buy side advisor for a large water utility in the mid-Atlantic region including supporting the review of revenue requirements, rates, and forecasts.
- Helped facilitate and manage processes for a nuclear plant auction by processing Q&A, collecting relevant documentation and managing the virtual data room for auction participants.
- Supported the auction process for steam and chilled water distribution and generation assets in the Midwest.
- Supported the development of a financial model to ascertain the net present value of several competing wholesale power purchase agreements and guided the client with a decision matrix for the qualitative aspects of the offers.
- Provided research on comparable transactions, previous mergers and acquisitions, and potential transaction opportunities for several clients.

### **Financial Analysis and Market Research**

Other financial analysis and market research Mr. Taylor has conducted include:

- Estimated the rate impact and costs associated with moving California energy market to 100% renewable.
- Assessed the consequences of a divestiture on the cost of service model for a New England gas distribution company.
- Developed distributed CNG/LNG market studies for two separate utilities and two separate competitive market participants.
- Modeling alternative mechanisms for the allocation of overhead costs to a nuclear plant.

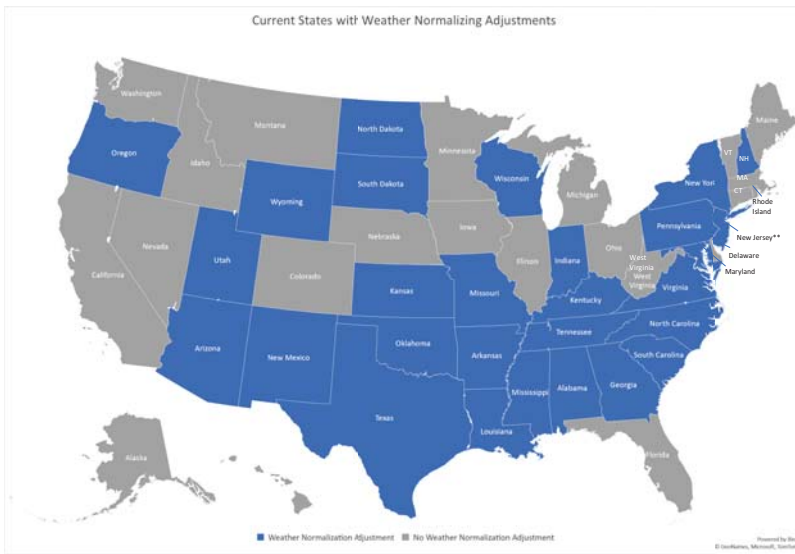


**UGI GAS**  
**JDT-2R**

Company	State	Tariff Available	Year Approved
Spire Alabama, Inc.	Alabama	Temperature Adjustment Rider	2018
Spire Gulf, Inc.	Alabama	Weather Impact Normalization Factor (WINF)	2017
Southwest Gas Corporation	Arizona	Delivery Charge Adjustment (DCA) Provision	2021
Arkansas Oklahoma Gas Corp.	Arkansas	Weather Normalization Adjustment (WNA)	2018
Black Hills Energy Arkansas, Inc. (d/b/a Black Hills Energy)	Arkansas	Weather Normalization Adjustment (WNA) Rider	2018
CenterPoint Energy Resources Corp.	Arkansas	Weather Normalization Adjustment (WNA)	*
Liberty Utilities	Georgia	Weather Normalization Adjustment Rider (WNAR)	2002/2013
Citizens Energy Group	Indiana	Normal Temperature Adjustment (NTA)	2008
CenterPoint Energy Indiana South	Indiana	Normal Temperature Adjustment (NTA)	
CenterPoint Energy Indiana North	Indiana	Normal Temperature Adjustment (NTA)	
Atmos Energy Corporation	Kansas	Weather Normalization Adjustment (WNA) Rider	*
Black Hills Kansas Gas Utility Company, LLC (d/b/a Black Hills Energy)	Kansas	Weather Normalization Adjustment (WNA) Rider	2015
Kansas Gas Service Company, Inc. (d/b/a ONE Gas)	Kansas	Weather Normalization Adjustment (WNA) Rider	2019
Atmos Energy Corporation	Kentucky	Weather Normalization Adjustment (WNA) Rider	*
Columbia Gas of Kentucky, Inc. (d/b/a NiSource)	Kentucky	Weather Normalization Adjustment (WNA)	2009
Delta Natural Gas Company, Inc.	Kentucky	Weather Normalization Adjustment (WNA) Clause	2021
Duke Energy Kentucky, Inc. (d/b/a Duke Energy)	Kentucky	Weather Normalization Adjustment (WNA) Rider	2019
Louisville Gas & Electric Company	Kentucky	Weather Normalization Adjustment (WNA) Clause	2019
Atmos Energy Corporation	Louisiana	Rate Stabilization Clause - Rider RSC	*
Atmos Energy Corporation	Louisiana	Weather Normalization Adjustment - Rider WNA	*
CenterPoint Energy Resources Corp.	Louisiana	Weather Normalization Adjustment (WNA) Rider	*
Columbia Gas of Maryland, Inc. (d/b/a NiSource)	Maryland	Weather Normalization Adjustment (WNA)	2016
Atmos Energy Corporation	Mississippi	Weather Normalization Adjustment (WNA) Rider	*
CenterPoint Energy Resources Corp.	Mississippi	Weather Normalization Adjustment (WNA)	2012
Midstates Natural Gas Corporation (d/b/a Liberty Utilities)	Missouri	Weather Normalization Adjustment Rider (WNAR)	2020
Missouri Gas Energy (d/b/a Spire)	Missouri	Weather Normalization Adjustment Rider (WNAR)	2018
Spire Missouri, Inc. (d/b/a Spire)	Missouri	Weather Normalization Adjustment Rider (WNAR)	2018
Liberty Utilities (EnergyNorth Natural Gas) Corp.	New Hampshire	Normal Weather Adjustment (NWA)	2021
Public Service Electric and Gas Company	New Jersey	Weather Normalization	2009
New Mexico Gas Company	New Mexico	Weather Normalization Adjustment (WNA)	2018
Consolidated Edison Company of New York, Inc. (d/b/a Consolidated Edison, Inc.)	New York	Weather Normalization Adjustment (WNA)	2019
KeySpan Gas East (Brooklyn Union of Long Island) Corporation (d/b/a National Grid)	New York	Weather Normalization Adjustment (WNA)	2021
Niagara Mohawk Power Corporation (d/b/a National Grid)	New York	Weather Normalization Adjustment (WNA)	2018
Orange and Rockland Utilities, Inc. (d/b/a Consolidated Edison, Inc.)	New York	Weather Normalization Adjustment (WNA)	2019
Rochester Gas & Electric Corporation (d/b/a Avangrid)	New York	Weather Normalization Adjustment (WNA)	2016
Central Hudson Gas and Electric	New York	Weather Normalization Adjustment (WNA)	2010
National Fuel Gas	New York	Weather Normalization Adjustment (WNA)	2018
New York State Electric and Gas	New York	Weather Normalization Adjustment (WNA)	2016
Piedmont Natural Gas Company, Inc. (d/b/a Duke Energy)	North Carolina	Margin Decoupling Tracker (WNA)	2008
Public Service Company of North Carolina, Inc. (d/b/a Dominion Energy)	North Carolina	Customer Usage Tracker - Rider C (WNA)	*
MDU Resources Group, Inc.	North Dakota	Distribution Delivery Stabilization Mechanism (DDSM)	*
Oklahoma Natural Gas Company (d/b/a ONE Gas)	Oklahoma	Temperature Adjustment Clause	2010
CenterPoint Energy Resources Corp.	Oklahoma	Weather Normalization Adjustment (WNA)	*
Arkansas Oklahoma Gas Corp.	Oklahoma	Weather Normalization Adjustment (WNA)	*
Northwest Natural Gas Company	Oregon	Weather Adjusted Rate Mechanism (WARM)	2012
Columbia Gas of Pennsylvania, Inc. (d/b/a NiSource)	Pennsylvania	Weather Normalization Adjustment (WNA)	2013
Philadelphia Gas Works	Pennsylvania	Weather Normalization Adjustment Clause	2002
National Fuel Gas Distribution Corporation (Proposed)	Pennsylvania	Weather Normalization Adjustment (WNA)	Proposed 2022
UGI Utilities, Inc.	Pennsylvania	Weather Normalization Adjustment (WNA)	2022
Piedmont Natural Gas Company, Inc. (d/b/a Duke Energy)	South Carolina	Weather Normalization Adjustment (WNA)	*
Dominion Energy South Carolina, Inc.	South Carolina	Weather Normalization Adjustment (WNA)	2017
MDU Resources Group, Inc.	South Dakota	Distribution Delivery Stabilization Mechanism (DDSM)	*
Piedmont Natural Gas Company, Inc. (d/b/a Duke Energy)	Tennessee	Weather Normalization Adjustment (WNA) Rider	*
Chattanooga Gas Company	Tennessee	Weather Normalization Adjustment (WNA) Rider	2018
Atmos Energy Corporation	Tennessee	Weather Normalization Adjustment (WNA) Rider	*
Texas Gas Service Company, Inc. (d/b/a ONE Gas) (Borger/Skellytown Serv Area)	Texas	Weather Normalization Adjustment Clause	*
Texas Gas Service Company, Inc. (d/b/a ONE Gas) (Central Gulf Serv Area)	Texas	Weather Normalization Adjustment Clause	*
Texas Gas Service Company, Inc. (d/b/a ONE Gas) (North Texas Serv Area)	Texas	Weather Normalization Adjustment Clause	*
Texas Gas Service Company, Inc. (d/b/a ONE Gas) (Rio Grande Valley Serv Area)	Texas	Weather Normalization Adjustment Clause	*
Texas Gas Service Company, Inc. (d/b/a ONE Gas) (West Texas Serv Area)	Texas	Weather Normalization Adjustment Clause	*
Atmos Energy Corporation (Mid-Tex Division)	Texas	Weather Normalization Adjustment (WNA)	*
Atmos Energy Corporation (West Texas Division)	Texas	Weather Normalization Adjustment (WNA) Rider	*
Dominion Energy Utah, Inc. (d/b/a Dominion Energy)	Utah	Weather Normalization Adjustment (WNA)	*
Columbia Gas of Virginia, Inc. (d/b/a NiSource)	Virginia	Weather Normalization Adjustment (WNA)	2016
Roanoke Gas Company	Virginia	Weather Normalization Adjustment (WNA)	2004
Virginia Natural Gas, Inc.	Virginia	Weather Normalization Adjustment (WNA)	*
Washington Gas Light Company	Virginia	Weather Normalization Adjustment (WNA)	2007
Atmos Energy Corporation	Virginia	Weather Normalization Adjustment (WNA)	*
Dominion Energy Wyoming, Inc. (d/b/a Dominion Energy)	Wyoming	Weather Normalization Adjustment (WNA)	*

\*Date implemented was not available on tariff.

State	State	WNA	Count of WNA
Alabama	AL	Weather Normalization Adjustment	2
Alaska	AK	No Weather Normalization Adjustment	
Arizona	AZ	Weather Normalization Adjustment	1
Arkansas	AR	Weather Normalization Adjustment	3
California	CA	No Weather Normalization Adjustment	
Colorado	CO	No Weather Normalization Adjustment	
Connecticut	CT	No Weather Normalization Adjustment	
Delaware	DE	No Weather Normalization Adjustment	
Florida	FL	No Weather Normalization Adjustment	
Georgia	GA	Weather Normalization Adjustment	1
Hawaii	HI	No Weather Normalization Adjustment	
Idaho	ID	No Weather Normalization Adjustment	
Illinois	IL	No Weather Normalization Adjustment	
Indiana	IN	Weather Normalization Adjustment	2
Iowa	IA	No Weather Normalization Adjustment	
Kansas	KS	Weather Normalization Adjustment	1
Kentucky	KY	Weather Normalization Adjustment	5
Louisiana	LA	Weather Normalization Adjustment	3
Maine	ME	No Weather Normalization Adjustment	
Maryland	MD	Weather Normalization Adjustment	1
Massachusetts	MA	No Weather Normalization Adjustment	
Michigan	MI	No Weather Normalization Adjustment	
Minnesota	MN	No Weather Normalization Adjustment	
Mississippi	MS	Weather Normalization Adjustment	2
Missouri	MO	Weather Normalization Adjustment	3
Montana	MT	No Weather Normalization Adjustment	
Nebraska	NE	No Weather Normalization Adjustment	
Nevada	NV	No Weather Normalization Adjustment	
New Hampshire	NH	Weather Normalization Adjustment	1
New Jersey**	NJ	Weather Normalization Adjustment	1
New Mexico	NM	Weather Normalization Adjustment	1
New York	NY	Weather Normalization Adjustment	8
North Carolina	NC	Weather Normalization Adjustment	2
North Dakota	ND	Weather Normalization Adjustment	1
Ohio	OH	No Weather Normalization Adjustment	
Oklahoma	OK	Weather Normalization Adjustment	3
Oregon	OR	Weather Normalization Adjustment	1
Pennsylvania	PA	Weather Normalization Adjustment	4
Rhode Island	RI	No Weather Normalization Adjustment	
South Carolina	SC	Weather Normalization Adjustment	2
South Dakota	SD	Weather Normalization Adjustment	1
Tennessee	TN	Weather Normalization Adjustment	3
Texas	TX	Weather Normalization Adjustment	7
Utah	UT	Weather Normalization Adjustment	1
Vermont	VT	No Weather Normalization Adjustment	
Virginia	VA	Weather Normalization Adjustment	5
Washington	WA	No Weather Normalization Adjustment	
West Virginia	WV	No Weather Normalization Adjustment	
Wisconsin	WI	Weather Normalization Adjustment	
Wyoming	WY	Weather Normalization Adjustment	1



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Docket No. C-2023-3038563**

**Bhavin Patel  
v.  
UGI Utilities, Inc – Gas Division**

**Statement No. 2R**

**Rebuttal Testimony**

**of**

**Kimberly M. Bassininsky  
Principal Rates Analyst, UGI Utilities, Inc.**

**Topics Addressed:                    Calculation and Application of the Weather  
Normalization Adjustment to the Complainant's  
Bills**

**Dated: September 25, 2023**

1 **Rebuttal Testimony of Kimberly M. Bassininsky**

2 **I. INTRODUCTION**

3 **Q. Please state your full name and business address.**

4 A. My name is Kimberly M. Bassininsky, and my business address is UGI Utilities, Inc., 1  
5 UGI Drive, Denver, PA 17517.

6  
7 **Q. By whom are you employed and in what capacity?**

8 A. I am employed by UGI Utilities, Inc. (“UGI”) as a Principal Analyst – Rates. UGI is a  
9 wholly-owned subsidiary of UGI Corporation (“UGI Corp.”). UGI has two operating  
10 divisions, the Electric Division (“UGI Electric”) and the Gas Division (“UGI Gas” or the  
11 “Company”), each of which is a public utility regulated by the Pennsylvania Public Utility  
12 Commission (“Commission” or “PUC”).

13  
14 **Q. Please describe your experience and employment history with UGI Utilities, Inc. –  
15 Gas Division.**

16 A. I began working for UGI in 2015 as a Senior Analyst Operations Analysis. Over the next  
17 five years, within the Financial Planning & Analysis department of UGI, I worked in  
18 various positions supporting the financial analysis, forecasting, and budgeting functions  
19 for UGI with the last position being Manager Financial Planning & Analysis. In 2020, I  
20 accepted a Senior Analyst position within the Rates department of UGI. I am currently a  
21 Principal Analyst Rates. I have supported and/or been responsible for various rate filings  
22 for both UGI Gas and Electric over the past three years. A copy of my resume is provided  
23 as UGI Gas Exhibit KMB-1R.

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**Q. What are your duties at your current position?**

A. I am significantly involved and/or primarily responsible for the preparation of the following tariff filings and related computations:

- Annual 1307(f) Purchased Gas Cost (“PGC”) filings on behalf of UGI Gas.
- Universal Service Program Rider, State Tax Adjustment Surcharge, Energy Efficiency and Conservation Rider, and Generation Supply Rate filings on behalf of UGI Electric.

In addition, I have assisted in the development of certain supporting schedules in the various base rate case proceedings. I served as the business lead for the implementation of the Weather Normalization Adjustment (“WNA”) and continue to be in heavily involved in the monitoring and reporting of results. Finally, I am currently responsible for the development and preparation of the Purchased Gas Adjustment (“PGA”) and Actual Cost Adjustment surcharge filings for UGI Gas’s Maryland division.

**Q. Ms. Bassininsky, have you previously testified before the Commission or any other regulatory authority?**

A. Yes. Please refer to UGI Gas Exhibit KMB-1R for a list of dockets in which I have testified.

**Q. Please summarize the content of your testimony.**

A. I will provide an overview of the calculations the Company utilizes to implement the WNA and verify the Company’s calculations of the WNA charges applied to the Complainant’s natural gas service bills.

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**Q. Have you reviewed Mr. Patel’s complaint against UGI Gas?**

A. Yes.

**Q. Please summarize your understanding of the issues raised in Mr. Patel’s complaint.**

A. Mr. Patel has requested that the WNA be discontinued. He disagrees with the Company’s implementation of the WNA because he believes that the charge is not related to his natural gas service.

**Q. Are you sponsoring any exhibits with your testimony?**

A. Yes. I am sponsoring the following Exhibits:

- UGI Gas Exhibit KMB-1R, Resume;
- UGI Gas Exhibit KMB-2R, UGI Gas’s Tariff Rider C – Weather Normalization Adjustment;
- UGI Gas Exhibit KMB-3R, Summary of WNA Charges Applied to the Complainant’s Bills;
- UGI Gas Exhibit KMB-4R, Copy of the Complainant’s Natural Gas Service Bills subject to WNA; and
- UGI Gas Exhibit KMB-5R, Verifications of the Calculations of the WNA Charges Applied to the Complainant’s Bills.

1        **II. UGI GAS’S IMPLEMENTATION OF THE WNA**

2        **Q.     Are you familiar with Rider C – Weather Normalization Adjustment (“Rider C”) of**  
3        **UGI Gas’s tariff?**

4        A.     Yes. Rider C is part of the Company’s tariff, which was filed with and approved by the  
5        Commission as part of the Company’s most recent base rate case in Docket No. R-2021-  
6        3030218. A copy of Rider C is provided as UGI Gas Exhibit KMB-2R.

7  
8        **Q.     Is Rider C, as part of the Company’s tariff, publicly available?**

9        A.     Yes.

10  
11       **Q.     Please describe the contents of Rider C.**

12       A.     The first section of Rider C provides an overview of the applicability and purpose of the  
13       rider. The tariff provision then contains a detailed section regarding the calculation of the  
14       WNA. It contains the formula used and detailed information about the inputs used in the  
15       calculation.

16  
17       **Q.     Could you please give an overview of the WNA?**

18       A.     The WNA is a method of adjusting distribution charges during the heating months based  
19       on “normal” weather. UGI requested approval to implement a WNA as part of its Base  
20       Rate Case filed on January 28, 2022, at Docket No. R-2021-3030218.

1 **Q. When was the WNA approved?**

2 A. By Order entered September 15, 2022, the Commission approved the Company's request  
3 to use a WNA. The Commission approved the WNA as a five-year pilot program. The  
4 WNA became effective on October 29, 2022.

5  
6 **Q. Why is the WNA needed?**

7 A. The WNA allows the Company to better align distribution rates with the level of  
8 distribution revenues authorized in the Company's base rate proceeding. For a description  
9 of the purpose and function of the WNA, please see the testimony of UGI Gas witness John  
10 D. Taylor, UGI Gas Statement 1R.

11  
12 **Q. What distribution costs are being addressed by the WNA?**

13 A. Distribution costs include all of the costs to build, operate and maintain the Company's  
14 distribution system and provide customers with distribution service. These costs were  
15 reviewed in detail in the Company's last base rate case and approved by the PUC as  
16 reasonable costs. These costs are primarily fixed in nature and do not vary much year to  
17 year.

18  
19 **Q. Do these costs vary based on the weather?**

20 A. No, they do not. They will generally be the same if the winter is very cold or very warm.

21

1 **Q. Do distribution costs include the cost of the gas supply itself?**

2 A. No. The gas supply, otherwise known as the commodity cost, is charged and recovered  
3 separately from the distribution revenues.

4

5 **Q. Without the WNA, how does the Company recover distribution costs?**

6 A. The approved distribution rates include a fixed customer charge and a volumetric  
7 distribution rate.

8

9 **Q. How does the Company calculate the volumetric portion of the distribution rates?**

10 A. The volumetric distribution rates are based, in part, on the amount of gas that is expected  
11 to pass through the Company's distribution system to customers during normal weather  
12 conditions.

13

14 **Q. How does the WNA align distribution costs with distribution revenues?**

15 A. When weather deviates from normal conditions, it creates a difference between actual and  
16 projected revenues, because the amount of gas flowing through the system to which  
17 distribution charges are being applied does not match what was used to set the rates. This  
18 results in the Company either recovering more or less revenue than it needs to operate. The  
19 WNA mechanism was designed to reduce the weather impact of the distribution revenue  
20 the Company recovers. The WNA aligns with the authorized distribution revenue approved  
21 by the PUC in the most recent base rate case.

22

1 **Q. Can customers opt-out of the WNA?**

2 A. No.

3

4 **Q. Why not?**

5 A. The WNA is a rider within the Company's PUC approved tariff. I am advised by Counsel  
6 that UGI Gas is legally required to bill all customers in accordance with the rates and  
7 regulations as set forth in the tariff. The Company is not permitted to apply its tariff to  
8 customers in a discriminatorily manner. Therefore, the WNA is applicable to all of the  
9 Company's customers.

10

11 **III. APPLICATION OF THE WNA TO COMPLAINANT'S BILLS**

12 **Q. As part of the Company's implementation of the WNA, did any customers receive**  
13 **charges or credits on their bills between October and May of the most recent heating**  
14 **season?**

15 A. Yes.

16

17 **Q. Did the Complainant receive any charges under the WNA?**

18 A. Yes. The Complainant received charges under the WNA during the most recent heating  
19 season.

20

1 **Q. During what billing periods was a WNA charge applied to Mr. Patel's natural gas**  
2 **service bill(s)?**

3 A. Mr. Patel's natural gas service bill included WNA charges for the periods ending December  
4 2, 2022, February 2, 2023, March 6, 2023, and May 4, 2023. These WNA charges were  
5 applied because the weather for the billing periods exceeded the 3% deadband, *i.e.*, the  
6 weather was more than 3% warmer than normal. The purpose and operation of the  
7 deadband are described in Mr. Taylor's testimony.

8

9 **Q. Have you reviewed the WNA charges that were applied to the Complainant's bill**  
10 **between the October 2022 and May 2023 billing periods?**

11 A. Yes. A copy of a summary view of the Complainant's billing periods subject to WNA is  
12 attached to my testimony as UGI Gas Exhibit KMB-3R.

13

14 **Q. What is the total amount of WNA charges that were applied to the Complainant's**  
15 **natural gas service bills between October 2022 and May 2023?**

16 A. The total WNA charges applied to the Complainant's natural gas service bills between  
17 October 2022 and May 2023 were \$20.50.

18

19 **Q. Were these charges reflected in Mr. Patel's monthly bill(s)?**

20 A. Yes. A copy of the Complainant's bills for the billing periods subject to WNA is attached  
21 to my testimony as UGI Gas Exhibit KMB-4R.

22

1 **Q. Have you personally verified the accuracy of the WNA charges applied to the**  
2 **Complainant's bills during the most recent heating season?**

3 A. Yes. A copy of the WNA calculation verifications I completed for the Complainant's billed  
4 WNA amounts is included as UGI Gas Exhibit KMB-5R.

5  
6 **Q. Please provide an overview of the WNA charges that were applied to Mr. Patel's**  
7 **natural gas service bill between the October 2022 and May 2023 billing periods.**

8 A. The Company accurately calculated and applied a WNA charge of \$2.00 to the  
9 Complainant's natural gas service bill for the period ending December 2, 2022. The  
10 Company accurately calculated and applied a WNA charge of \$9.00 to the Complainant's  
11 natural gas service bill for the period ending February 2, 2023. The Company accurately  
12 calculated and applied a WNA charge of \$8.00 to the Complainant's natural gas service  
13 bill for the period ending March 6, 2023. The Company accurately calculated and applied  
14 a WNA charge of \$1.50 to the Complainant's natural gas service bill for the period ending  
15 May 4, 2023.

16  
17 **Q. Were there billing periods between October 2022 and May 2023 during which Mr.**  
18 **Patel was not assessed a WNA charge?**

19 A. Yes. Mr. Patel's natural gas service bills for the periods ending November 1, 2022, January  
20 4, 2023, and April 4, 2023, did not contain a WNA charge because the weather for those  
21 billing periods was either within the deadband, *i.e.* the weather was not 3% colder or  
22 warmer during those billing periods, or the resulting calculated difference in weather  
23 normalized and actual billed Ccfs did not round to at least 1 Ccf. For these months, the

1 Company's treatment of the Complainant's bills was consistent with the rules for the WNA  
2 articulated in the Company's tariff.

3  
4 **Q. Can you please describe where the WNA charges are marked for each bill during the**  
5 **active WNA period?**

6 A. WNA charges can be found on the top half of the bill under the heading "Current Bill  
7 Information." This section contains the charges for the current billing period. The WNA  
8 credits or charges, if applicable, appear on the line labeled "Weather Normalization  
9 Adjustment" with the amount of the adjustment shown to the right.

10  
11 **Q. What is the formula the Company uses to determine a WNA charge or credit?**

12 A. The Company's WNA formula that is applied to bills of Residential and Non-Residential  
13 customers under Rate Schedules R/RT and N/NT for the heating season of October  
14 through May is included in Rider C to the Company's tariff and is shown below:

15 
$$WNBC = BLMC + \left[ \frac{((NHDD + \text{or } - (NHDD * 3\%))}{AHDD} \times (AMC - BLMC) \right]$$

16 
$$WNAC = WNBC - AMC$$

17 
$$WNA = WNAC \times \text{Distribution Charge}$$

18  
19 **Q. How is that formula used to calculate and apply the WNA to customer bills?**

20 A. For the WNA to be calculated, there are conditions that need to be met, which are outlined  
21 in Rider C of the Company's tariff. For the impacted billing periods, weather must be either  
22 more than 3% colder than normal or more than 3% warmer than normal based on heating  
23 degree days. The absolute value of the difference in Actual Heating Degree Days

1 (“AHDD”) and Normal Heating Degree Days (“NHDD”) must be greater than the result  
2 of multiplying the NHDD \* 3% rounded to the nearest whole number. In addition, a  
3 customer must have actual monthly Ccfs that exceed their calculated baseload, which will  
4 be defined further below.

5  
6 WNBC:

7 This first line of the equation is calculating the Ccfs that would have been  
8 expected to flow through the distribution system under normal weather  
9 conditions. In order to calculate this, the actual billed Ccfs are split into  
10 baseload and weather sensitive components.  
11

12 The baseload component uses a customer’s average daily usage taken from  
13 bills with read dates of June 21st through September 20th over a thirty-six-  
14 month period. The resulting average daily baseload is then multiplied by the  
15 number of days in the current billing period and rounded to the nearest  
16 whole Ccf. This represents the Ccfs for the current billing period that are  
17 not impacted by weather. This number is referred to as “BLMC” in the  
18 equation.  
19

20 The weather sensitive component used in the equation is found by taking  
21 the actual billed Ccfs and subtracting the BLMC calculated above. This is  
22 shown in the equation as “(AMC-BLMC)”.

23  
24 The equation also adjusts the Normal Heating Degree Days (“NHDD”) for  
25 the 3% deadband. The 3% is used to widen what is considered normal  
26 within the calculation so that WNA is not assessed for the first 3% variance  
27 in NHDD. The NHDD is multiplied by 3% and rounded to the nearest whole  
28 number. When there are more Actual Heating Degree Days (“AHDD”) than  
29 normal, the NHDD is increased by 3%. When there are fewer AHDD than  
30 normal, the NHDD is decreased by 3%. This is shown in the equation as  
31 “(NHDD +/- (NHDD \* 3%))”.

32  
33 The adjusted NHDD calculated in the step above is then divided by AHDD  
34 and multiplied by the weather sensitive Ccfs identified above and rounded  
35 to the nearest whole Ccf. This calculates the expected weather sensitive  
36 Ccfs under normal conditions, and is shown in the equation as  
37 “[ ( (NHDD +/- (NHDD \* 3%)) / AHDD) x (AMC-BLMC) ]”.

38  
39 The above calculated normalized weather sensitive Ccfs is then added to the  
40 previously calculated baseload for the billing period (BLMC) to arrive at  
41 the total Ccfs that would have been expected under normal weather  
42 conditions shown in the equation as “WNBC”.

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WNAC:

This part of the equation subtracts the calculated Ccfs expected with normal weather (“WNBC”) from the actual billed Ccfs based on meter read data (“AMC”).

WNA:

This takes the difference in expected Ccfs under normal weather and actual Ccfs and multiplies by the Distribution Charge rate as defined in the UGI Gas Service Tariff No. 7. This is the amount that appears on a customer’s bill on the Weather Normalization Adjustment line within the Current Charges section.

**Q. Can you please provide a detailed breakdown of how the WNA formula described above was calculated and applied to Mr. Patel’s natural gas service bill for the November 2022 billing period, which ended December 2, 2022?**

A. Yes. The calculations showing the application of the WNA to Mr. Patel’s natural gas service bill for the November 2022 billing period are shown on page 2 of UGI Gas Exhibit KMB-5R.

**Q. What is the first step to calculate the WNA charge applied to Mr. Patel’s November 2022 bill?**

A. The first step is to calculate the deadband. The deadband is calculated by multiplying the NHDD of 658 by 3% and rounding to the nearest whole number. In this example, the deadband would be  $658 * 3\%$ , which is 20. Since AHDD of 589 was less than the NHDD of 658, indicating weather warmer than normal, the adjusted NHDD would be 638 (which is  $658 - 20$ ). If it had been colder than normal, the adjusted NHDD would have been 678 (which is  $658 + 20$ ).

1 **Q. What is the next step?**

2 A. The next step is to calculate the monthly baseload for the November 2022 billing period.

3

4 **Q. What is the monthly baseload?**

5 A. The monthly baseload is the expected non-temperature sensitive usage for a customer. This  
6 is calculated by using a customer's average daily summer usage, as measured over a period  
7 of three years, and multiplying it by the number of days in the billing period.

8

9 **Q. How is the monthly baseload used in the WNA calculation?**

10 A. By subtracting the monthly baseload from a customer's total billing consumption for the  
11 period, temperature sensitive consumption can be identified. This is the part of the  
12 customer's usage that varies based on the temperature. It is this temperature sensitive usage  
13 that is adjusted as one of the steps in the WNA calculation.

14

15 **Q. Can you explain how the monthly baseload of 6 Ccf was calculated for the November  
16 2022 billing period?**

17 A. Yes. The baseload was calculated by multiplying the number of days in the billing period,  
18 which was 31, by the average daily baseload of 0.1845018 and rounding to the nearest  
19 whole Ccf.

20

1 **Q. What is the next step in the calculation?**

2 A. The next step is to calculate the Weather Normalized Billing amount, which represents the  
3 volume of gas we would have expected the customer to have used under normal weather  
4 conditions.

5  
6 **Q. How was the Weather Normalized Billing of 58 Ccfs for the November 2022 billing  
7 period calculated?**

8 A. The Weather Normalized Billing Ccfs is calculated by the taking the temperature sensitive  
9 usage of 48 Ccf, which is total consumption of 54 Ccf less baseload of 6 Ccf and  
10 multiplying it by the quotient of the adjusted NHDD of 638 divided by AHDD of 589 and  
11 then adding that sum to the monthly baseload of 6 Ccf. In this example the calculation  
12 would be as follows:  $48 \text{ Ccf} * (638/589) + 6 \text{ Ccf} = 58 \text{ Ccf}$ .

13  
14 **Q. What is the next step in the calculation?**

15 A. The next step is to calculate the difference in Weather Normalized and Actual Billed  
16 Consumption, which is referenced in the WNA formula as WNAC.

17  
18 **Q. How was the difference in Weather Normalized and Actual Billed Consumption of 4  
19 Ccf calculated for the November 2022 billing period?**

20 A. This was calculated by taking the Weather Normalized Billing of 58 Ccf and subtracting  
21 the actual billed consumption of 54 Ccf.

22

1 **Q. How was the billed WNA debit of \$2.00 calculated?**

2 A. The above difference between weather normalized and actual billed Ccf of 4 is then  
3 multiplied by the applicable distribution rate, which in this example is \$0.50024 per Ccf,  
4 to arrive at a WNA debit of \$2.00.

5  
6 **Q. Are the above calculations related to the application of the WNA to Mr. Patel's**  
7 **November 2022 bill consistent with the methodology contained in the Company's**  
8 **tariff in Rider C, i.e., UGI Gas Exhibit KMB-2R?**

9 A. Yes.

10

11 **Q. Are the above WNA calculations accurate and was the WNA charge properly applied**  
12 **to Mr. Patel's account for the November 2022 billing period?**

13 A. Yes.

14

15 **Q. Do the other pages in UGI Gas Exhibit KMB-5R show the same calculations for the**  
16 **different periods in the most recent heating season – i.e., when the WNA was in effect**  
17 **– for Mr. Patel's account?**

18 A. Yes. Specifically, page 4 shows my verification of the application of the WNA charge for  
19 the January 2023 billing period, page 5 shows my verification of the application of the  
20 WNA charge for the February 2023 billing period, and page 7 shows my verification of the  
21 application of the WNA charge for the April 2023 billing period.

22

1 **Q. Were WNA charges applied in the applicable billing periods calculated in the same**  
2 **manner as you just explained?**

3 A. Yes.

4

5 **Q. Were all of those WNA charges calculated correctly and consistent with the**  
6 **Company's tariff Rider C?**

7 A. Yes.

8

9 **Q. In his Complaint, Mr. Patel stated that he believes that the WNA "has nothing to do**  
10 **with [his] actual usage of natural gas." Can you please respond to that allegation?**

11 A. Mr. Patel's actual usage of natural gas is used in the WNA calculation. Actual usage for  
12 the current bill period as well as historical average daily baseload are two inputs used in  
13 the WNA calculation. The calculation is performed for each customer based on their usage  
14 and weather. The WNA adjusts distribution charges for the period based on experienced  
15 weather. For clarification, the WNA does not impact the commodity costs a customer pays.  
16 Commodity charges are based on actual usage.

17

18 **Q. Was Mr. Patel billed in accordance with the Company's PUC-approved WNA at all**  
19 **times relevant to his Complaint?**

20 A. Yes.

21

22 **Q. Does this conclude your rebuttal testimony?**

23 A. Yes, it does.

**UGI GAS**  
**EXHIBIT KMB-1R**

# **KIMBERLY M. BASSININSKY**

## **PRINCIPAL ANALYST RATES**

### **Work Experience**

2022 – Present	Principal Analyst Rates (UGI Utilities, Inc., Denver, Pa)
2020 – 2022	Senior Analyst Rates (UGI Utilities, Inc., Denver, Pa)
2019 – 2020	Manager Financial Planning & Analysis (UGI Utilities, Inc., Denver, Pa)
2018 – 2019	Principal Financial Planning & Analysis Leader (UGI Utilities, Inc., Denver, Pa)
2017 – 2018	Senior Supervisor Financial Planning & Analysis (UGI Utilities, Inc., Reading, Pa)
2016 – 2017	Senior Supervisor Operations Analysis (UGI Utilities, Inc., Reading, Pa)
2015 – 2016	Senior Analyst Operations Analysis (UGI Utilities, Inc., Reading, Pa)
2013 – 2015	Finance Business Partner – Sales & Marketing (Rentokil North America, Reading, Pa)
2005 – 2013	Senior Financial Analyst – Marketing (Garden Fresh Restaurant Corp., San Diego, Ca)
2003 – 2005	Financial Analyst II (Garden Fresh Restaurant Corp., San Diego, Ca)
1999 – 2003	Financial Analyst I (Garden Fresh Restaurant Corp., San Diego, Ca)

### **Education**

MBA, Alvernia University, Reading, Pa.

BS, Business Administration (Finance), San Diego State University, San Diego, Ca.

### **Previous Testimony**

UGI 2023 1307(f) Proceeding	Docket No. R-2023-3040290
UGI 2022 1307(f) Proceeding	Docket No. R-2022-3032242
UGI 2022 Commodity and Purchased Gas Proceeding	MD PSC Case No. 9516(e)
UGI 2021 1307(f) Proceeding	Docket No. R-2021-3025652
UGI 2021 Commodity and Purchased Gas Proceeding	MD PSC Case No. 9516(d)

### **Assisted in Preparing**

UGI 2023 Electric Base Rate Case:	Docket No. R-2022-3037368
UGI 2022 Gas Base Rate Case:	Docket No. R-2021-3030218
UGI 2021 Electric Base Rate Case:	Docket No. R-2021-3023618
UGI 2020 Gas Base Rate Case:	Docket No. R-2019-3015162
UGI 2019 Gas Base Rate Case:	Docket No. R-2018-3006814
UGI 2017 Gas Base Rate Case (the former North Rate District):	Docket No. R-2016-2580030

**UGI GAS**  
**EXHIBIT KMB-2R**

**RULES AND REGULATIONS****12. Rider C****WEATHER NORMALIZATION ADJUSTMENT****(C)****Applicability and Purpose:**

A Weather Normalization Adjustment ("WNA") shall be applied to bills of Residential and Non-Residential customers under Rate Schedules R, RT, N and NT, for any bills rendered during the heating season October through May. The WNA shall commence with bills rendered on and after November 1, 2022 and shall continue as a five-year pilot unless otherwise modified by Commission Order.

WNA is a distribution charge adjustment and is considered a basic service charge.

Calculated WNA amounts shall be subject to Rider A - State Tax Adjustment Surcharge and Rider I - Distribution System Improvement Charge. No additional riders or surcharges will be applied to the calculated WNA.

**Calculation of Adjustment Amount:**

The WNA will be applied to October through May billing cycles and shall be calculated on a customer account specific basis in accordance with the formula below:

$$\text{WNBC} = \text{BLMC} + [((\text{NHDD} \pm (\text{NHDD} * 3\%)) / \text{AHDD}) \times (\text{AMC} - \text{BLMC})]$$

$$\text{WNAC} = \text{WNBC} - \text{AMC}$$

$$\text{WNA} = \text{WNAC} \times \text{Distribution Charge}$$

- (a) Weather Normalized Billing Ccfs ("WNBC") will be calculated as the Base Load Monthly Ccfs ("BLMC") added to the product of the Normal Heating Degree Days ("NHDD", adjusted for a 3% deadband as further discussed in subparts (i) and (j) below), divided by the Actual Heating Degree Days ("AHDD") and the Actual Monthly Ccfs ("AMC") less the BLMC. Weather Normalized Billing Ccfs (WNBC) will only be calculated if the AMC exceeds the BLMC. WNA will not be applicable for the billing period if AMC is less than the BLMC.
- (b) BLMC shall be established for each customer using the customer's actual average daily consumption from the billing system, measured in Ccfs, using bills with read dates of June 21<sup>st</sup> thru September 20<sup>th</sup> over a thirty-six-month period multiplied by the number of days in the billing period. The average daily base load is recalculated monthly using the most recent thirty-six months of bill history. If less than twelve months of bill history is available for the premise, an average base load for the related customer class will be applied.
- (c) AMC shall be measured for each customer and billing cycle and will be inclusive of any heating value corrections.
- (d) NHDD shall be applied on a Delivery Region specific basis as determined by the customer's geographical location and, for any given day within a billing period, shall be based upon the Delivery Region's 15-year average for the given day. NHDD shall be updated every 5 years using the methodology established in the Company's general rate case proceeding at R-2021-3030218 with the next scheduled update of the NHDD to be effective on October 1, 2025, and thereafter every five years.

**(C) Indicates Change**

**RULES AND REGULATIONS****12. Rider C - Continued****WEATHER NORMALIZATION ADJUSTMENT****(C)**

- (e) AHDD shall be the actual experienced heating degree days during the billing cycle for the customer's assigned Delivery Region, as determined by the customer's geographical location. A Delivery Region's AHDD shall be based upon experienced actual Gas Day temperatures as reported by the National Oceanic and Atmospheric Administration (NOAA) for weather stations located within that Delivery Region pursuant to the application of the Company's established Delivery Region calculation methodology.
- (f) The period for which both NHDD and AHDD will be measured for each billing period used for the WNA calculation will be based on the starting day of the customer's billing cycle minus one day through last day of billing cycle minus one day. If AHDD is unavailable for any day(s) during that period, the respective NHDD for the same day(s) will also be excluded from the calculation, thereby excluding any days missing AHDD from the WNBC calculation.
- (g) AMC will be subtracted from the WNBC to compute the Weather Normalized Adjustment Ccfs ("WNAC").
- (h) The WNAC shall then be multiplied by the applicable Rate Schedule Distribution Charge based on service rendered to compute the WNA amount that will be charged or credited to each Residential and Non-Residential customer served under Rate Schedules R, RT, N and NT.
- (i) A deadband of 3% shall apply. The WNA for a billing cycle will apply only if the AHDD for the billing cycle are lower than 97% or higher than 103% of the NHDD for the billing cycle.
- (j) The WNA factor shall be calculated by first adjusting the NHDD for the billing cycle by the deadband percentage of 3%. The deadband percentage shall be multiplied by the NHDD and then added to NHDD for the billing period when the weather is colder than normal (i.e., AHDD>NHDD) or subtracted from NHDD for the billing period when the weather is warmer than normal (i.e., AHDD<NHDD).
- (k) In the event a customer's bill needs to be canceled and rebilled at any time, the WNA will be recalculated using the most recently available data for the billing period. In some cases, updates in data used in the calculation, may result in a different WNA for the billing period. Bills requiring manual processing shall not have WNA applied.
- (l) The Company will file reporting detailing weather normalization information with the Commission as outlined in the Final Order at the Company's Base Rate Proceeding at Docket No. R-2021-3030218.

**(C) Indicates Change**

**UGI GAS**  
**KMB-3R**

**Bhavin Patel**

Account Number: [REDACTED]

*Bill Periods Subject to WNA*

Billing Period	Current Charges	
	Total	Weather Normalization Adjustment
10/4/2022 to 11/1/2022	\$ 15.86	\$ -
11/2/2022 to 12/2/2022	\$ 81.79	\$ 2.00
12/3/2022 to 1/4/2023	\$ 153.32	\$ -
1/5/2023 to 2/2/2023	\$ 123.73	\$ 9.00
2/3/2023 to 3/6/2023	\$ 113.48	\$ 8.00
3/7/2023 to 4/4/2023	\$ 36.88	\$ -
4/5/2023 to 5/4/2023	\$ 49.76	\$ 1.50
	<u>\$ 574.82</u>	<u>\$ 20.50</u>

**UGI GAS**  
**KMB-4R**



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Rate Classification (RT):  
Residential Heating-CC

**Billing Period:**

10/04/2022 to 11/01/2022 (29 days)

Actual Read

Questions?

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.15.

**Past Bill Information**

The balance on your last bill was ..... \$26.19  
Thank you for your payment of ..... -26.19  
Amount due as of 11/03/2022 ..... 0.00

Account Number

**Current Bill Information**

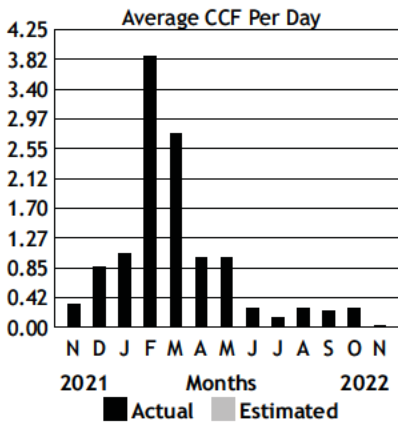
Customer Charge ..... 14.66  
Supplier Commodity (1 CCF at \$0.63900) ..... 0.64  
Distribution Charges (1 CCF at \$0.56000) ..... 0.56  
Current Charges ..... 15.86

Utility charges owed this bill ..... \$15.86

**Current Bill Information - NORDIC ENERGY SERVICES LLC**

NORDIC ENERGY SERVICES LLC natural gas costs are shown in the  
supplier charges above.

Total Amount Due By 11/28/2022 ..... \$15.86



Average	Last Year	This Year
CCF/Day	0.32	0.03
Daily Temperature	61°F	54°F

**Meter Information - Next Read Date December 06, 2022**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4345	4346	1

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: [REDACTED] Rate Schedule: RT\_H

**Supplier Information**

■ NORDIC ENERGY SERVICES LLC  
1 Tower Lane Ste 300  
Oakbrook Terrace IL 60181 or Phone Number

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Due Date  
November 28, 2022

Amount Due  
\$15.86

With Late Charge  
\$16.10

0100000001586000000016104



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Rate Classification (RT):  
Residential Heating-CC

Billing Period:  
11/02/2022 to 12/02/2022 (31 days)  
Actual Read

**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.60.

**Past Bill Information**

The balance on your last bill was ..... \$15.86  
Thank you for your payment of ..... -15.86  
Amount due as of 12/06/2022 ..... 0.00

Account Number

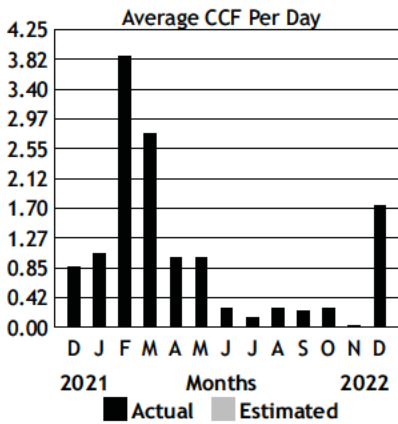
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (54 CCF at \$0.63900) ..... 34.51  
Distribution Charges (54 CCF at \$0.55944) ..... 30.21  
Weather Normalization Adjustment ..... 2.00  
Natural Gas System Improvement Charge ..... 0.07  
Current Charges ..... 81.79

Utility charges owed this bill ..... **\$81.79**

Current Bill Information - NORDIC ENERGY SERVICES LLC  
NORDIC ENERGY SERVICES LLC natural gas costs are shown in the  
supplier charges above.

Total Amount Due By 12/27/2022 ..... **\$81.79**



Average	Last Year	This Year
CCF/Day	0.87	1.74
Daily Temperature	42°F	46°F

**Meter Information - Next Read Date January 06, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4346	4400	54

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: RT\_H

**Supplier Information**

■ NORDIC ENERGY SERVICES LLC  
1 Tower Lane Ste 300  
Oakbrook Terrace IL 60181 or Phone Number

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Due Date  
December 27, 2022

Amount Due  
\$81.79

With Late Charge  
\$83.02



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

**Rate Classification (R):**  
Residential Heating

**Billing Period:**  
12/03/2022 to 01/04/2023 (33 days)

Actual Read  
Questions?

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$1.93.

**Past Bill Information**

The balance on your last bill was ..... \$81.79  
Thank you for your payment of ..... -81.79  
Amount due as of 01/07/2023 ..... 0.00

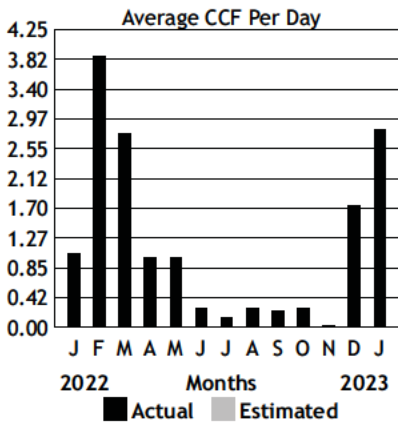
Account Number

**Current Bill Information**

Customer Charge ..... 15.00  
Commodity Charge (93 CCF at \$0.91155) ..... 84.77  
Distribution Charges (93 CCF at \$0.56624) ..... 52.66  
Natural Gas System Improvement Charge ..... 0.89  
Current Charges ..... 153.32

Utility charges owed this bill ..... \$153.32

Total Amount Due By 01/27/2023 ..... \$153.32



Average	Last Year	This Year
CCF/Day	1.06	2.82
Daily Temperature	41°F	36°F

**Meter Information - Next Read Date February 06, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4400	4493	93

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: R\_H

**Important message(s) from UGI**

- Your current UGI natural gas price to compare is \$0.91155/CCF.
- Effective JAN 01, 2023, the Natural Gas System Improvement Charge increased from 0.14% to 1.27%.
- Your natural gas total annual usage is 440 CCF. Your natural gas average monthly usage is 37 CCF.
- We can make your energy costs easier on your budget with our 12 month Budget Billing plan. Your monthly payment would be approximately \$61.00. For more information about this plan call UGI.
- Help prevent pipeline damage, accidents and service disruptions. Call 811 before you dig.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Due Date  
January 27, 2023

Amount Due  
\$153.32

With Late Charge  
\$155.62

0100000015332000000155628



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
01/05/2023 to 02/02/2023 (29 days)

**Actual Read**  
**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.79.

**Past Bill Information**

The balance on your last bill was ..... \$153.32  
Thank you for your payment of ..... -153.32  
Amount due as of 02/07/2023 ..... 0.00

Account Number

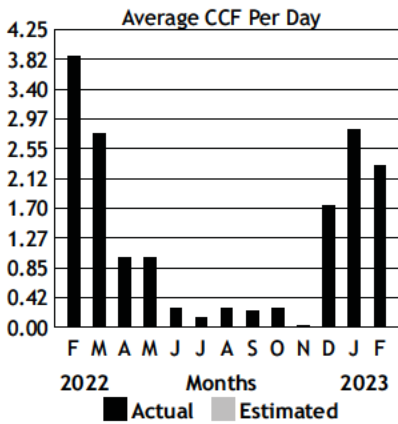
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (67 CCF at \$0.85900) ..... 57.55  
Distribution Charges (67 CCF at \$0.56627) ..... 37.94  
Weather Normalization Adjustment ..... 9.00  
Natural Gas System Improvement Charge ..... 0.79  
PA Sales Tax ..... 3.45  
Current Charges ..... 123.73

**Utility charges owed this bill** ..... **\$123.73**

**Current Bill Information - DIRECT ENERGY SERVICES, LLC**  
DIRECT ENERGY SERVICES, LLC natural gas costs are shown in the  
supplier charges above.

**Total Amount Due By 02/27/2023** ..... **\$123.73**



Average	Last Year	This Year
CCF/Day	3.86	2.31
Daily Temperature	26°F	39°F

**Meter Information - Next Read Date March 08, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4493	4560	67

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: RT\_H

**Supplier Information**

■ DIRECT ENERGY SERVICES, LLC  
PO Box 180  
Tulsa OK 74101-0180 or Phone Number 888-734-0741



■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

<b>Due Date</b>
February 27, 2023
<b>Amount Due</b>
\$123.73
<b>With Late Charge</b>
\$125.59

0100000012373000000125594



**Billing Summary for Service to:**  
BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
02/03/2023 to 03/06/2023 (32 days)  
Actual Read

**Questions?**  
Call (800) 276-2722 or write to UGI at  
PO Box 13009  
Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.75.

**Past Bill Information**

The balance on your last bill was ..... \$123.73  
Payments ..... 0.00  
Amount due as of 03/08/2023 ..... 123.73

Account Number

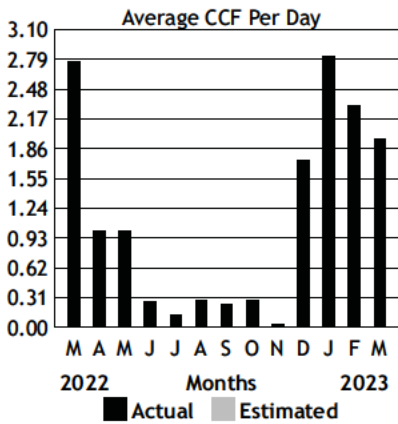
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (63 CCF at \$0.85900) ..... 54.12  
Distribution Charges (63 CCF at \$0.56540) ..... 35.62  
Weather Normalization Adjustment ..... 8.00  
Natural Gas System Improvement Charge ..... 0.74  
Current Charges ..... 113.48

**Utility charges owed this bill** ..... **\$237.21**

**Current Bill Information - DIRECT ENERGY SERVICES, LLC**  
DIRECT ENERGY SERVICES, LLC natural gas costs are shown in the  
supplier charges above.

**Total Amount Due By 03/29/2023** ..... **\$237.21**



Average	Last Year	This Year
CCF/Day	2.77	1.97
Daily Temperature	36°F	41°F

**Meter Information - Next Read Date April 06, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4560	4623	63

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: RT\_H

**Supplier Information**

■ DIRECT ENERGY SERVICES, LLC  
PO Box 180  
Tulsa OK 74101-0180 or Phone Number 888-734-0741



■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Due Date

March 29, 2023

Amount Due

\$237.21

With Late Charge

\$237.21

0100000023721000000237213



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Rate Classification (RT):  
Residential Heating-CC

**Billing Period:**

03/07/2023 to 04/04/2023 (29 days)

Actual Read

Questions?

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.30.

**Past Bill Information**

The balance on your last bill was ..... \$237.21  
Thank you for your payment of ..... -10.00  
Amount due as of 04/06/2023 ..... 227.21

Account Number

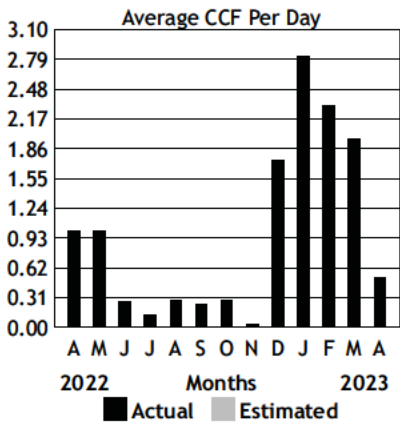
**Current Bill Information**

Customer Charge ..... 15.00  
Supplier Commodity (15 CCF at \$0.85900) ..... 12.89  
Distribution Charges (15 CCF at \$0.56133) ..... 8.42  
Natural Gas System Improvement Charge ..... 0.57  
Current Charges ..... 36.88

Utility charges owed this bill ..... **\$264.09**

Current Bill Information - DIRECT ENERGY SERVICES, LLC  
DIRECT ENERGY SERVICES, LLC natural gas costs are shown in the  
supplier charges above.

Total Amount Due By 04/27/2023 ..... **\$264.09**



Average	Last Year	This Year
CCF/Day	1.00	0.52
Daily Temperature	45°F	44°F

**Meter Information - Next Read Date May 08, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
[REDACTED]	4623	4638	15

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: RT\_H

**Supplier Information**

■ DIRECT ENERGY SERVICES, LLC  
PO Box 180  
Tulsa OK 74101-0180 or Phone Number 888-734-0741



■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

Due Date

April 27, 2023

Amount Due

\$264.09

With Late Charge

\$264.09

0100000026409000000264094



**Billing Summary for Service to:**

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

**Rate Classification (RT):**  
Residential Heating-CC

**Billing Period:**  
04/05/2023 to 05/04/2023 (30 days)

**Actual Read**  
**Questions?**

Call (800) 276-2722 or write to UGI at  
PO Box 13009

Reading, PA 19612-3009

\*Your current UGI charges include State  
taxes totaling about \$0.39.

**Past Bill Information**

The balance on your last bill was .....	\$264.09
Payments .....	0.00
Opshare Energy Payments .....	-265.00
Amount due as of 05/08/2023 .....	-0.91

Account Number

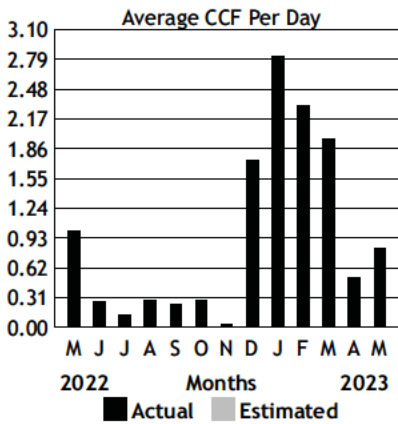
**Current Bill Information**

Customer Charge .....	15.00
Supplier Commodity (25 CCF at \$0.73900) .....	18.48
Distribution Charges (25 CCF at \$0.56160) .....	14.04
Weather Normalization Adjustment .....	1.50
Natural Gas System Improvement Charge .....	0.74
Current Charges .....	49.76

**Utility charges owed this bill** ..... **\$48.85**

**Current Bill Information - SHIPLEY ENERGY COMPANY**  
SHIPLEY ENERGY COMPANY natural gas costs are shown in the  
supplier charges above.

**Total Amount Due By 05/30/2023** ..... **\$48.85**



Average	Last Year	This Year
CCF/Day	1.00	0.83
Daily Temperature	53°F	57°F

**Meter Information - Next Read Date June 07, 2023**

Meter Number	Previous Reading	Present Reading	CCF Used
██████████	4638	4663	25

**Shopping Information Box**

When shopping for natural gas with a Natural Gas Supplier, please provide the following data below. If you are already shopping, know your contract expiration date.

Account Number: \_\_\_\_\_ Rate Schedule: RT\_H

**Supplier Information**

■ SHIPLEY ENERGY COMPANY  
415 NORWAY ST POBX 15052  
YORK PA 17405 or Phone Number 800-839-1849

■ Commodity prices and charges are set by the natural gas supplier you have chosen. The Public Utility Commission regulates distribution prices and services.

If you pay at a payment agent please take your entire bill. Make check payable to UGI. Keep this part for your records. Important information is on the back of this bill.



UGI Utilities, Inc.  
PO Box 15503  
Wilmington, DE 19886-5503

Account Number

Please pay by the due date to avoid the late charge. Please return this portion with your payment.

BHAVIN PATEL  
8572 MAYFAIR CT  
BREINIGSVILLE PA 18031-1567

**Due Date**  
May 30, 2023

**Amount Due**  
\$48.85

**With Late Charge**  
\$48.85

0100000004885000000048851

**UGI GAS**  
**KMB-5R**

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	[REDACTED]		
Billing Period:	10/4/2022	to	11/1/2022
Deadband:	3%		
Actual Heating Degree Days (AHDD):	326		
Normal Heating Degree Days (NHDD):	297		
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	306		
No. of Days in Billing Period	29		
Average Daily Baseload in Ccfs:	0.1845018		
Baseload Monthly (BLMC) in Ccfs:	5		
Actual Consumption Billed (AMC) in Ccfs:	1		
Distribution Charge per Ccf:	\$	0.50024	
Weather Normalized Billing Ccfs (WNBC):	1		
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	-		
Weather Normalization Adjustment (WNA):	\$	-	
Prorated for November 1st Rate Determination Date:	\$	-	

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	██████████		
Billing Period:	11/2/2022	to	12/2/2022
Deadband:	3%		
Actual Heating Degree Days (AHDD):	589		
Normal Heating Degree Days (NHDD):	658		
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	638		
No. of Days in Billing Period	31		
Average Daily Baseload in Ccfs:	0.1845018		
Baseload Monthly (BLMC) in Ccfs:	6		
Actual Consumption Billed (AMC) in Ccfs:	54		
Distribution Charge per Ccf:	\$	0.50024	
Weather Normalized Billing Ccfs (WNBC):	58		
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	4		
Weather Normalization Adjustment (WNA):	\$	2.00	

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	██████████	
Billing Period:	12/3/2022 to	1/4/2023
Deadband:	3%	
Actual Heating Degree Days (AHDD):	950	
Normal Heating Degree Days (NHDD):	974	
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	945	
No. of Days in Billing Period	33	
Average Daily Baseload in Ccfs:	0.1845018	
Baseload Monthly (BLMC) in Ccfs:	6	
Actual Consumption Billed (AMC) in Ccfs:	93	
Distribution Charge per Ccf:	\$	0.50024
Weather Normalized Billing Ccfs (WNBC):	93	
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	-	
Weather Normalization Adjustment (WNA):	\$	-

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	[REDACTED]	
Billing Period:	1/5/2023 to	2/2/2023
Deadband:	3%	
Actual Heating Degree Days (AHDD):	761	
Normal Heating Degree Days (NHDD):	1,006	
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	976	
No. of Days in Billing Period	29	
Average Daily Baseload in Ccfs:	0.1845018	
Baseload Monthly (BLMC) in Ccfs:	5	
Actual Consumption Billed (AMC) in Ccfs:	67	
Distribution Charge per Ccf:	\$	0.50024
Weather Normalized Billing Ccfs (WNBC):	85	
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	18	
Weather Normalization Adjustment (WNA):	\$	9.00

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	[REDACTED]		
Billing Period:	2/3/2023	to	3/6/2023
Deadband:	3%		
Actual Heating Degree Days (AHDD):	772		
Normal Heating Degree Days (NHDD):	1,020		
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	989		
No. of Days in Billing Period	32		
Average Daily Baseload in Ccfs:	0.1845018		
Baseload Monthly (BLMC) in Ccfs:	6		
Actual Consumption Billed (AMC) in Ccfs:	63		
Distribution Charge per Ccf:	\$	0.50024	
Weather Normalized Billing Ccfs (WNBC):	79		
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	16		
Weather Normalization Adjustment (WNA):	\$	8.00	

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	[REDACTED]	
Billing Period:	3/7/2023 to	4/4/2023
Deadband:	3%	
Actual Heating Degree Days (AHDD):	603	
Normal Heating Degree Days (NHDD):	653	
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	633	
No. of Days in Billing Period	29	
Average Daily Baseload in Ccfs:	0.1845018	
Baseload Monthly (BLMC) in Ccfs:	5	
Actual Consumption Billed (AMC) in Ccfs:	15	
Distribution Charge per Ccf:	\$	0.50024
Weather Normalized Billing Ccfs (WNBC):	15	
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	-	
Weather Normalization Adjustment (WNA):	\$	-

**UGI Utilities, Inc.**  
**Rider C - Weather Normalization Adjustment**  
Per UGI Gas - Pa. P.U.C. No. 7



Calculation of Adjustment Amount:

$$WNBC = BLMC + [ ((NHDD +/- (NHDD * 3\%)) / AHDD) \times (AMC - BLMC) ]$$

$$WNAC = WNBC - AMC$$

$$WNA = WNAC \times \text{Distribution Charge}$$

*Term components defined below. Please see Rider C - Weather Normalization Adjustment in UGI Gas Division Service Tariff No. 7 for complete tariff.*

Account Number:	██████████		
Billing Period:	4/5/2023	to	5/4/2023
Deadband:	3%		
Actual Heating Degree Days (AHDD):	279		
Normal Heating Degree Days (NHDD):	334		
NHDD Adjusted for Deadband (NHDD +/- (NHDD * 3%)):	324		
No. of Days in Billing Period	30		
Average Daily Baseload in Ccfs:	0.1845018		
Baseload Monthly (BLMC) in Ccfs:	6		
Actual Consumption Billed (AMC) in Ccfs:	25		
Distribution Charge per Ccf:	\$	0.50024	
Weather Normalized Billing Ccfs (WNBC):	28		
Difference in Weather Normalized and Actual Billing Ccfs (WNAC):	3		
Weather Normalization Adjustment (WNA):	\$	1.50	