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July 31, 2024

VIA E-FILE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

**Re: UGI Utilities, Inc.'s Universal Service and Energy Conservation Plan for 2020-2025;
Petition to Amend Universal Service and Energy Conservation Plan for 2020-2025; Docket
Nos. M-2019-3014966, P-2020-3019196**

Dear Secretary Chiavetta:

UGI Utilities, Inc. ("UGI") files this letter in response to the Pennsylvania Public Utility Commission's ("Commission") June 13, 2024 Order at Docket No. M-2023-3038944.¹ UGI intends to participate in the Department of Human Services ("DHS") LIHEAP data sharing as described in the Commission's Order. As set forth herein, UGI addresses each of the requirements established in the Commission's June 13, 2024 Order for participation in the DHS data sharing.

Response to the Commission's June 13, 2024 Order

Use the LIHEAP data to conduct individualized universal service outreach as soon as possible (ideally monthly) after receiving the household's data from DHS.

UGI will engage in individualized outreach after receiving household data from DHS through its existing automated email communication platform for those customers who have opted into receiving communications via email. UGI will also use direct mail to conduct individualized outreach to identified customers that have not opted to receive email communications from UGI. UGI will complete this outreach within 30 business days after receiving the data.

Use a simplified/streamlined process for households to enroll in universal service programs and recertify in CAP if the income and household data was received by DHS in the prior 12 months and/or the current or prior LIHEAP program year, without requiring additional applications or documentation.

UGI will implement a simplified/streamlined process for households with current DHS data to enroll in CAP by expediting the CAP enrollment process for customers who call UGI and are receiving LIHEAP but who are not currently enrolled in CAP. Specifically, data sharing will enable UGI to enroll customers in CAP without requiring the customer to submit income details to Community Based Organizations.

¹ See 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Docket No. M-2023-3038944 (Order entered June 13, 2024).

Discuss its plans for individualized outreach and simplified/streamlined enrollment with its respective Universal Service Advisory Group/Committee.

UGI intends to engage in discussion with its Universal Service Advisory Committee regarding its plans for individualized outreach and simplified/streamlined enrollment based on the data received from DHS. This discussion will occur on or before December 16, 2024.

Send a communication to each auto-recertified CAP participant based on LIHEAP data with their updated CAP bill amount (if applicable) and instructions on how to contact the energy public utility to provide additional updates on household income/size if the household information has changed since completing the LIHEAP application.

Currently, customers enrolled in CAP who receive LIHEAP do not need to recertify for each year LIHEAP is received, up until year 3 of receiving LIHEAP, at which time they must recertify. UGI currently contacts customers who enroll in LIHEAP with instructions on how to contact UGI with updates on household income/size if that information has changed since completing the LIHEAP application and will continue to do so after receiving data from DHS.

Provide educational materials to inform customers about the purpose and effect of the checkbox on the 2024-2025 LIHEAP application which will grant permission for DHS to share this information with energy public utilities. Include a timeline for when the materials will be provided to customers.

UGI intends to utilize the educational materials provided as Appendix A to the Commission's June 13, 2024 Order. The educational materials will be provided via email for those customers who have provided UGI with an email address as a manner of communication and direct mail for those customers who do not receive email communications

UGI requests the Commission's approval to incorporate these provisions into its currently effective USECP, which was approved by the Commission on January 16, 2020 and amended on June 16, 2022. UGI anticipates addressing these provisions in its upcoming USECP, which it anticipates filing in early 2025.

Data Sharing Agreement

UGI intends to execute the Data Sharing Agreement provided by DHS, which is necessary to receive the data from DHS.

Recovery of Incremental Outside Costs

UGI anticipates that it will incur less than \$50,000 in annual incremental costs to implement DHS data sharing, which includes costs for outside resources needed for marketing and communication, as well as postage costs. UGI requests the Commission's approval to recover these incremental costs, not to exceed \$50,000, in its USP Rider, and implementation of DHS data sharing as detailed above is contingent on recovery of these costs through the USP Rider.

Potential Impact to Arrearage Forgiveness and CAP Shortfall

UGI estimates that implementing these changes could result in approximately 9,000 new CAP customers during the first year. The costs associated with an additional 9,000 new CAP customers are estimated to

be approximately \$1.2 million in arrearage forgiveness and approximately \$6.1 million in CAP shortfall. This amounts to an annual cost of approximately \$13-\$14 for residential customers paying the USP Rider.

Respectfully submitted,

/s/ Lindsay A. Berkstresser

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