



March 3, 2025

**Via Email Only**

Deputy Chief Administrative Law Judge Mark A. Hoyer  
Administrative Law Judge Charece Z. Collins  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
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201 Fifth Avenue  
Pittsburgh, PA 15222  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)  
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**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division  
Docket No. R-2024-3052716**

***Prehearing Conference Memorandum of CAUSE-PA***

Your Honors:

Please find the attached **Prehearing Conference Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ria Pereira".

Ria Pereira, Esq.  
*Counsel for CAUSE-PA*

CC: Secretary Rosemary Chiavetta (via E-file only)  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2024-3052716  
 :  
 UGI Utilities, Inc. - Gas Division :

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES  
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

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**PENNSYLVANIA UTILITY LAW PROJECT**

*Counsel for CAUSE-PA*

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**March 3, 2025**

On February 25, 2025, a Prehearing Conference Order was issued by Deputy Chief Administrative Law Judge (ALJ) Mark A. Hoyer and ALJ Charece Z. Collins, setting a telephonic prehearing conference for Tuesday, March 4, 2025 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than Monday, March 3, 2025 at 12:00 p.m. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

**I. Background**

On January 27, 2025, UGI Utilities, Inc. – Gas Division (UGI or the Company) submitted a rate filing, Supplement No. 55 to UGI Gas Tariff – PA P.U.C. Nos. 7 and 7S, which proposes to increase UGI’s annual jurisdictional revenue by approximately \$110.395 million, or by 9.7% over existing rates. (UGI Statement of Reasons at 1). If the Company’s request is approved in its entirety, the monthly bill for a residential heating customer using an average of 73.7 hundred cubic feet (Ccf) per month will increase from \$104.47 to \$115.74, or by 10.8%. (Id.) In its proposed rate structure, UGI seeks to increase its fixed monthly residential customer charge 33% from \$15.00 to \$19.95, an increase of \$4.95 per month – or \$59.40 per year. (UGI St. 10 at 23).

On February 18, 2025, CAUSE-PA filed a Petition to Intervene and Answer, requesting full intervenor status as an active party to the proceeding.

On February 20, 2025, the Commission entered a Suspension and Investigation Order suspending the UGI tariff by operation of law, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained therein. (S&I Order).

## **II. Issues to be Presented**

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, UGI must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2203(8). In determining whether rates are just and reasonable, the Commission must examine whether rates are affordable and accessible to those served.

In the event that the Commission approves any natural gas distribution rate increase, the Commission should condition approval on UGI's agreement to perform such actions as are necessary to assure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of UGI's proposed tariff changes and testimony and opposes UGI's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low income and otherwise economically vulnerable residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of UGI's rate filing and proposed rate increase on low income and otherwise economically vulnerable households.
- ii. The effect of UGI's proposed \$19.95 fixed residential customer charge on low income and otherwise economically vulnerable households, and the ability to achieve appreciable bill savings through adoption of energy efficiency measures.
- iii. The effect of UGI's rate filing and proposed rate increase on low income and otherwise economically vulnerable households enrolled in or eligible

for UGI's Universal Service Programs, and the continued adequacy of those programs in delivering universally accessible service.

- iv. The impacts of UGI's Weather Normalization Adjustment (WNA) mechanism on low income and otherwise economically vulnerable customers. Based on a preliminary review, CAUSE-PA submits that the continued application of UGI's WNA may result in unjust, unreasonable, and discriminatory rates for consumers and must be reviewed by the Commission.

### **III. Witnesses and Testimony**

CAUSE-PA intends to present the following witnesses to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to

Your Honors and the parties:

Harry Geller, Esq.  
118 Locust Street  
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Mr. Geller and Mr. Cicero will address the issues identified above, as well as other issues that may arise throughout this proceeding.

### **IV. Discovery**

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

### **V. Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

**VI. Service on CAUSE-PA**

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

**VII. Representation of CAUSE-PA at Prehearing Conference**

At the Prehearing Conference, CAUSE-PA will be represented by Ria Pereira, Esq.

**VIII. Litigation Schedule**

CAUSE-PA is currently involved in discussions with UGI and other parties to reach a mutually agreeable litigation schedule. CAUSE-PA supports telephonic hearings in this matter.

**IX. Public Input Hearings**

Given the size of the requested rate increases and the customer impact it may cause, CAUSE-PA respectfully requests that public input hearings be held in this matter.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference  
Memorandum.

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



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Elizabeth R. Marx, Esq., PA ID: 309014  
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Respectfully Submitted,  
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