



Lindsay A. Berkstresser, Esq.

UGI Corporation
500 North Gulph Road King
of Prussia, PA
19406

Post Office Box 858
Valley Forge, PA 19482-0858

(610) 768-6799: Telephone

April 1, 2025

VIA ELECTRONIC FILING

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

**Re: UGI Utilities, Inc.’s Universal Service and Energy Conservation Plan for
January 1, 2020 – December 31, 2025; Docket No. M-2019-3014966**

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

Dear Secretary Chiavetta:

Enclosed please find UGI Utilities, Inc.’s (“UGI” or the "Company") CAP Credit
Evaluation Report for 2024, which is being filed in the above-referenced docket.

If you have any questions, please contact me directly at (610) 768-6799.

Very truly yours,

/s/ Lindsay A. Berkstresser
Counsel for UGI

Enclosure

cc: Certificate of Service (parties to the USECP Proceeding)
Joseph Magee, Bureau of Consumer Services, *via email*, jmagee@pa.gov
Jennifer Johnson, Bureau of Consumer Services, *via email*,
jennifjohn@pa.gov Christina Chase-Pettis, Office of Communications, *via*
email, cchasepett@pa.gov Shari A. Williams, Office of Communications, *via*

email, shariwilli@pa.gov Louise Fink Smith, Law Bureau, *via email*,
finksmith@pa.gov

NazAarah Sabree, Office of Small Business Advocate, *via email*, ra-nsabree@pa.gov

Allison Kaster, Bureau of Investigation & Enforcement, *via email*, akaster@pa.gov

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UGI Utilities, Inc. – Gas Division and	:	
UGI Utilities, Inc. – Electric Division	:	Docket No. M-2019-3014966
Universal Service and Energy	:	
Conservation Plan for 2020-2025	:	
	:	
UGI Utilities, Inc. – Gas Division and	:	
UGI Utilities, Inc. – Electric Division	:	
Petition to Amend Universal Service	:	Docket No. P-2020-3019196
and Energy Conservation Plan for	:	
2020-2025	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, this 1st day of April 2025, served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL:

Allison Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
akaster@pa.gov

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
say@pa.gov

Elizabeth Marx, Esquire
Ria Pereira, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
JLVullo@aol.com

Christy M. Appleby, Esquire
Darryl A. Lawrence, Esquire
Office of Consumer Advocate
555 Walnut St
Forum Place, 5th Floor
Harrisburg, PA 17101-1921
CAppleby@paoca.org
DLawrence@paoca.org

/s/ Lindsay A. Berkstresser

CAP Credit Evaluation Report - 2024 Summary

CY 2024	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total	Average Annual
Actual Annual Residential Customers as of 12/31	N/A	N/A	N/A	684,956	677,772
UGI South	N/A	N/A	N/A	394,426	389,842
- Heating	N/A	N/A	N/A	375,704	371,337
- Non Heating	N/A	N/A	N/A	18,722	18,505
UGI North	N/A	N/A	N/A	159,228	157,619
- Heating	N/A	N/A	N/A	153,166	153,166
- Non Heating	N/A	N/A	N/A	4,453	4,453
UGI Central	N/A	N/A	N/A	76,153	75,308
- Heating	N/A	N/A	N/A	73,539	73,539
- Non Heating	N/A	N/A	N/A	1,789	1,769
UGI Electric	N/A	N/A	N/A	55,149	55,003
- Heating	N/A	N/A	N/A	10,630	10,602
- Non Heating	N/A	N/A	N/A	44,519	44,401

Annual CAP Enrollments as of 12/31	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total	Average Annual¹
UGI South	4,994	5,509	3,363	13,866	12,743
- Heating	4,777	5,267	3,260	13,304	12,138
- Non Heating	217	242	103	562	605
UGI North	3,018	4,092	2,816	9,926	8,992
- Heating	2,977	4,006	2,788	9,771	8,738
- Non Heating	41	86	28	155	254
UGI Central	702	1,262	872	2,836	2,756
- Heating	696	1,244	860	2,800	2,691
- Non Heating	6	18	12	36	65
UGI Electric	1,953	2,095	1,441	5,489	4,643
- Heating	665	550	329	1,544	895
- Non Heating	1,288	1,545	1,112	3,945	3,748

Annual Non-CAP Residential Customers as of 12/31	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total	Average Annual
UGI South	N/A	N/A	N/A	380,560	377,099
- Heating	N/A	N/A	N/A	362,400	359,199
- Non Heating	N/A	N/A	N/A	18,160	17,900
UGI North	N/A	N/A	N/A	149,302	148,627
- Heating	N/A	N/A	N/A	143,395	144,428
- Non Heating	N/A	N/A	N/A	4,298	4,199
UGI Central	N/A	N/A	N/A	73,317	72,552
- Heating	N/A	N/A	N/A	70,739	70,848
- Non Heating	N/A	N/A	N/A	1,753	1,704
UGI Electric	N/A	N/A	N/A	49,660	50,360
- Heating	N/A	N/A	N/A	9,086	9,707
- Non Heating	N/A	N/A	N/A	40,574	40,653

CAP Participation Rate	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	N/A	N/A	N/A	4%
- Heating	N/A	N/A	N/A	4%
- Non Heating	N/A	N/A	N/A	3%
UGI North	N/A	N/A	N/A	6%
- Heating	N/A	N/A	N/A	6%
- Non Heating	N/A	N/A	N/A	3%
UGI Central	N/A	N/A	N/A	4%
- Heating	N/A	N/A	N/A	4%
- Non Heating	N/A	N/A	N/A	2%
UGI Electric	N/A	N/A	N/A	10%
- Heating	N/A	N/A	N/A	15%
- Non Heating	N/A	N/A	N/A	9%

CAP Credit Evaluation Report - 2024 Summary

Total Annual CAP Costs

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
Admin (All Areas)²	\$339,722.79	\$413,385.97	\$270,470.54	\$1,023,579.30
UGI South	\$164,429.45	\$181,386.03	\$110,728.12	\$456,543.60
- Heating	\$157,284.64	\$173,418.08	\$107,336.80	\$438,039.53
- Non Heating	\$7,144.81	\$7,967.95	\$3,391.32	\$18,504.07
UGI North	\$101,184.06	\$137,191.91	\$94,411.63	\$332,787.60
- Heating	\$99,809.46	\$134,308.60	\$93,472.88	\$327,590.94
- Non Heating	\$1,374.60	\$2,883.31	\$938.75	\$5,196.66
UGI Central	\$21,117.40	\$37,963.19	\$26,231.30	\$85,311.90
- Heating	\$20,936.91	\$37,421.72	\$25,870.32	\$84,228.96
- Non Heating	\$180.49	\$541.47	\$360.98	\$1,082.94
UGI Electric	\$52,991.87	\$56,844.84	\$39,099.48	\$148,936.20
- Heating	\$18,043.83	\$14,923.47	\$8,926.95	\$41,894.24
- Non Heating	\$34,948.05	\$41,921.38	\$30,172.54	\$107,041.96

Arrearage Forgiveness

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	\$783,936.28	\$707,276.47	\$483,650.07	\$1,974,862.82
- Heating	\$766,929.69	\$682,817.75	\$475,781.96	\$1,925,529.40
- Non Heating	\$17,006.59	\$24,458.72	\$7,868.11	\$49,333.42
UGI North	\$523,447.93	\$548,006.17	\$391,147.14	\$1,462,601.24
- Heating	\$519,408.47	\$543,569.67	\$389,069.91	\$1,452,048.05
- Non Heating	\$4,039.46	\$4,436.50	\$2,077.23	\$10,553.19
UGI Central	\$99,893.07	\$125,059.69	\$91,563.14	\$316,515.90
- Heating	\$99,521.39	\$124,618.18	\$91,175.27	\$315,314.84
- Non Heating	\$371.68	\$441.51	\$387.87	\$1,201.06
UGI Electric	\$481,634.89	\$386,308.18	\$277,512.90	\$1,145,455.97
- Heating	\$182,971.58	\$111,720.11	\$69,682.03	\$364,373.72
- Non Heating	\$298,663.31	\$274,588.07	\$207,830.87	\$781,082.25

CAP Credits

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	\$2,894,809.94	\$1,866,808.87	\$614,554.70	\$5,376,173.51
- Heating	\$2,843,571.94	\$1,827,082.14	\$609,343.56	\$5,279,997.64
- Non Heating	\$51,238.00	\$39,726.73	\$5,211.14	\$96,175.87
UGI North	\$2,222,133.14	\$1,890,622.99	\$840,836.65	\$4,953,592.78
- Heating	\$2,211,020.03	\$1,864,583.11	\$837,044.47	\$4,912,647.61
- Non Heating	\$11,113.11	\$26,039.88	\$3,792.18	\$40,945.17
UGI Central	\$426,852.79	\$456,702.77	\$207,563.27	\$1,091,118.83
- Heating	\$421,957.51	\$451,539.44	\$204,746.14	\$1,078,243.09
- Non Heating	\$4,895.28	\$5,163.33	\$2,817.13	\$12,875.74
UGI Electric	\$2,817,199.22	\$2,265,418.03	\$1,084,859.20	\$6,167,476.45
- Heating	\$1,141,650.78	\$662,124.67	\$251,594.89	\$2,055,370.34
- Non Heating	\$1,675,548.44	\$1,603,293.36	\$833,264.31	\$4,112,106.11

of CAP Credits

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	31,227	29,525	17,546	78,298
- Heating	30,093	28,328	17,140	75,561
- Non Heating	1,134	1,197	406	2,737
UGI North	19,709	22,645	14,680	57,034
- Heating	19,482	22,217	14,569	56,268
- Non Heating	227	428	111	766
UGI Central	4,579	6,733	4,522	15,834
- Heating	4,537	6,662	4,481	15,680
- Non Heating	42	71	41	154
UGI Electric	12,870	14,855	9,591	37,316
- Heating	4,720	4,025	2,047	10,792
- Non Heating	8,150	10,830	7,544	26,524

Average Annual CAP Credits

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	\$92.70	\$63.23	\$35.03	\$68.66
- Heating	\$94.49	\$64.50	\$35.55	\$69.88
- Non Heating	\$45.18	\$33.19	\$12.84	\$35.14
UGI North	\$112.75	\$83.49	\$57.28	\$86.85
- Heating	\$113.49	\$83.93	\$57.45	\$87.31
- Non Heating	\$48.96	\$60.84	\$34.16	\$53.45
UGI Central	\$93.22	\$67.83	\$45.90	\$68.91
- Heating	\$93.00	\$67.78	\$45.69	\$68.77
- Non Heating	\$116.55	\$72.72	\$68.71	\$83.61
UGI Electric	\$218.90	\$152.50	\$113.11	\$165.28
- Heating	\$241.88	\$164.50	\$122.91	\$190.45
- Non Heating	\$205.59	\$148.04	\$110.45	\$155.03

Gross Residential Write-Offs

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
All Natural Gas	N/A	N/A	N/A	\$40,918,215.36
Electric	N/A	N/A	N/A	\$4,396,977.84

Gross Residential Write-Offs Confirmed Low Income Customers

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
All Natural Gas	N/A	N/A	N/A	\$6,698,895.71
Electric	N/A	N/A	N/A	\$1,230,361.68

CAP Credit Evaluation Report - 2024 Summary

Pre & Post CAP Usage YOY Change (Stated as avg yearly %) ^{3,4}

	FPIG 0%-50%	FPIG 51%-100%	FPIG 101%-150%	Total
UGI South	-7%	-8%	-5%	-7%
- Heating	-7%	-9%	-6%	-7%
- Non Heating	N/A	6%	11%	11%
UGI North	-8%	-6%	-15%	-10%
- Heating	-8%	-6%	-15%	-10%
- Non Heating	N/A	N/A	N/A	N/A
UGI Central	-5%	-17%	-7%	-11%
- Heating	-5%	-17%	-7%	-11%
- Non Heating	-7%	N/A	N/A	-7%
UGI Electric	-13%	-7%	-21%	-13%
- Heating	-3%	-16%	-17%	-10%
- Non Heating	-20%	6%	-24%	-16%

¹ Heating and Non-Heating breakdown by division is based upon % of Heat vs Non-Heating customers.

² Admin cost by FPIG and heating vs. non heating was calculated based on enrollment data by FPIG and heating vs. non heating.

³ Column E does not represent the sum of columns B through D. Formula to calculate YOY % Change is sum of Post Usage Less Pre Usage divided by Pre Usage.

⁴ N/A for UGI South, UGI North, UGI Central as there were no non-heating customers that met the high usage threshold within specific federal poverty levels.

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

2024 - All

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	1,593	\$ 620,252.27	\$389
	Non Heating	\$ 560.00	53	\$ 21,587.32	\$407
UGI North	Heating	\$ 950.00	1,738	\$ 782,838.85	\$450
	Non Heating	\$ 560.00	31	\$ 11,818.24	\$381
UGI Central	Heating	\$ 950.00	280	\$ 114,856.13	\$410
	Non Heating	\$ 560.00	9	\$ 4,898.43	\$544
UGI Electric	Heating	\$ 1,200.00	651	\$ 866,531.44	\$1,331
	Non Heating	\$ 700.00	1,892	\$ 2,238,833.09	\$1,183

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

2024 - FPIG Level 1

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	1,037	\$ 425,658.30	\$410
	Non Heating	\$ 560.00	28	\$ 11,108.64	\$397
UGI North	Heating	\$ 950.00	979	\$ 476,364.01	\$487
	Non Heating	\$ 560.00	7	\$ 3,073.20	\$439
UGI Central	Heating	\$ 950.00	141	\$ 61,835.32	\$439
	Non Heating	\$ 560.00	2	\$ 3,422.01	\$1,711
UGI Electric	Heating	\$ 1,200.00	375	\$ 549,274.12	\$1,465
	Non Heating	\$ 700.00	771	\$ 977,762.62	\$1,268

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

2024 - FPIG Level 2

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	434	\$ 155,600.41	\$359
	Non Heating	\$ 560.00	25	\$ 10,478.68	\$419
UGI North	Heating	\$ 950.00	562	\$ 228,649.65	\$407
	Non Heating	\$ 560.00	21	\$ 7,746.48	\$369
UGI Central	Heating	\$ 950.00	98	\$ 39,854.90	\$407
	Non Heating	\$ 560.00	4	\$ 494.28	\$124
UGI Electric	Heating	\$ 1,200.00	203	\$ 249,170.62	\$1,227
	Non Heating	\$ 700.00	729	\$ 859,627.55	\$1,179

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

2024 - FPIG Level 3

Company	Account Type	Previous Maximum Shortfall Amount	Number of accounts above previous maximum shortfall	Total dollars above previous maximum shortfall	Average of CAP credits above previous maximum shortfall
UGI South	Heating	\$ 950.00	122	\$ 38,993.56	\$320
	Non Heating	\$ 560.00	2	\$ 320.96	\$160
UGI North	Heating	\$ 950.00	197	\$ 77,825.19	\$395
	Non Heating	\$ 560.00	3	\$ 998.56	\$333
UGI Central	Heating	\$ 950.00	41	\$ 13,165.91	\$321
	Non Heating	\$ 560.00	3	\$ 982.14	\$327
UGI Electric	Heating	\$ 1,200.00	73	\$ 68,086.70	\$933
	Non Heating	\$ 700.00	392	\$ 401,442.92	\$1,024