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VIA ELECTRONIC FILING

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

Re: Energy Efficiency and Conservation Programs; Docket No. M-2025-3052826

Dear Secretary Chiavetta:

Please find UGI Utilities Inc. - Gas Division's and Electric Division's Comments to the Tentative Implementation Order in the above-referenced docket. If you have any questions, please contact me directly at (610) 992-3763.

Very truly yours,

/s/ Michael S. Swerling
Michael S. Swerling
Counsel for UGI

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Energy Efficiency and : Docket No. M-2025-3052826
Conservation Program :

**UGI UTILITIES, INC. – GAS DIVISION’S AND ELECTRIC DIVISION’S
COMMENTS TO THE COMMISSION’S TENTATIVE
IMPLEMENTATION ORDER**

I. INTRODUCTION

On February 20, 2025, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Implementation Order (“TIO”) to present its evaluation of the costs and benefits of the Energy Efficiency and Conservation (“EE&C”) program. The Commission also proposed further incremental reductions to electric consumption and peak demand for electric distribution companies (“EDC”) to meet in the upcoming Phase V of the EE&C program.¹ (TIO at 5-8). UGI Utilities, Inc. – Electric Division (“UGI Electric”) and Gas Division (“UGI Gas”) (collectively referred to herein as “UGI” or “Company”) submits these comments in response to the Commission’s proposals for Phase V of Act 129’s EE&C program.

II. COMMENTS

A. Fuel Switching.

The TIO states that incentivizing electrification from fossil fuel sources is inconsistent with PA Act 129’s purpose to reduce electric demand and consumption. (TIO at 56). However, the Commission recommends that EDCs pursue other state programs that support electrification,

¹ 66 Pa. C.S. §§ 2806.1(c)(3) and 2806.1(d)(2).

including but not limited to Inflation Reduction Act (“IRA”) and the Home Electrification and Appliances Rebate Program (“HEAR”). (TIO at 57). UGI offers a portfolio of voluntary EE&C programs and seeks allowance to continue incentivizing high efficiency gas and electric equipment for all qualifying customers, regardless of their prior fuel source. This level of flexibility, which supports customers’ efficiency objectives, will minimize customer and contractor confusion and provide continued opportunities for customers to utilize the available fuel source that best meets their needs.

Additionally, the TIO stated that “[t]he Commission recognizes the uncertainty regarding the timeline and other implementation details of the IRA-funded programs.” (TIO at 57). Regarding this uncertainty, the Company seeks clarification on how fuel switching would operate if IRA programs were no longer available or if there were material changes to IRA funding.

III. CONCLUSION

The Company appreciates the opportunity to provide comments to the Tentative Implementation Order and asks that the Commission favorably consider its comments.

Respectfully submitted,

/s/ Michael S. Swerling

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