



June 17, 2025

VIA E-File

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement
v. UGI Utilities, Inc – Gas Division**

Docket No. M-2025-3032708

Dear Secretary Homsher,

Attached for filing, please find the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Joint Petition for Approval of Settlement** for the above-referenced proceeding.

Copies were served electronically consistent with the attached certificate of service.

Respectfully submitted,



Counsel for CAUSE-PA

CC: Certificate of Service
Office of Special Assistants (via email only – ra-OSA@pa.gov)

Encl.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pa. Public Utility Commission, :
Bureau of Investigation and Enforcement :
: Docket No. M-2025-3032708
v. :
: :
UGI Utilities, Inc – Gas Division :

Certificate of Service

I hereby certify that I have this day served copies of the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Joint Petition for Approval of Settlement** upon the parties of record in the above captioned proceedings in accordance with the requirements of 52 Pa. Code § 1.54.

VIA Email

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pa. Public Utility Commission, :
Bureau of Investigation and Enforcement : Docket No. M-2025-3032708
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**COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA
TO THE JOINT PETITION FOR APPROVAL OF SETTLEMENT**

PENNSYLVANIA UTILITY LAW PROJECT

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)¹ respectfully submits the following Comments in response to the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Opinion and Order (Order) entered May 8, 2025. The Commission’s Order was published in the Pennsylvania Bulletin on May 24, 2025, opening a 25-day public comment period related to the Settlement Agreement between UGI Utilities, Inc. – Gas Division (“UGI” or “the Company”) and the PUC’s Bureau of Investigation and Enforcement (I&E) (collectively, the Settling Parties), at the above-captioned Docket.

CAUSE-PA recommends amendment to the proposed Settlement to increase the penalty amount and direct the fine to support the expanded availability of emergency grant assistance through UGI’s Hardship Fund, known as Operation Share. In turn, we recommend that the Commission require UGI to reach out to all impacted customers who are still without service and provide detailed information about their available options to reconnect – including the availability of Operation Share and other universal service programs.

Application of settlement proceeds should provide a clear public benefit, prioritizing the mitigation of harm to impacted consumers. A check to the Commonwealth’s general fund does not help to alleviate the disproportionate harm of UGI’s actions on low and moderate income families faced with the loss of gas service to their home. Thus, we recommend a more targeted and restorative penalty – allowing the penalty to serve the same households most impacted by UGI’s actions.

¹ CAUSE-PA is an unincorporated association of low income Pennsylvanians from all corners of the state that advocates on behalf of its members to families of limited economic means across the state are able to connect and maintain safe and affordable water, electric, heating and telecommunication services to their home.

II. BACKGROUND

In late March 2022 (March 2022 Incident) and April 2023 (April 2023 Incident), UGI terminated service for nearly 4,000 customers without proper notice.² The facts averred in the Joint Petition for Settlement do not identify the number of low income households impacted by these incidents; however, given the disproportionately high number of low income households that are subject to involuntary termination, it is likely that a disproportionately high number of low income households were impacted by UGI’s failure to provide proper notice.³

With limited exception, involuntary termination procedures require three distinct types of advance notice. First, utilities must provide a 10-day written termination notice, which may be valid up to 60 days.⁴ Next, utilities must attempt to make personal contact with a customer or adult occupant at least three days prior to termination, either in person, by phone, or – with the requisite consent – electronically.⁵ If personal contact is achieved through a phone call, a public utility must place at least two calls on different days and at different times of the day.⁶ Immediately prior to termination, utilities are further required to attempt to make personal contact at the residence.⁷ This is colloquially known as the “last knock” rule.

On June 1, 2022, the PUC’s Bureau of Consumer Services (BCS) referred information to I&E related to UGI’s failure to attempt personal contact at least 3 days in advance of termination.⁸ Soon thereafter, I&E initiated an informal investigation of UGI’s actions and business practices

² Order at 6.

³ See Pa PUC, BCS, 2023 Report on Universal Service and Collections Performance (Sept. 2024), [2023 universal service report-final rev041525.pdf](#).

⁴ 52 Pa. Code § 56.91(a)

⁵ 52 Pa. Code § 56.93(a)

⁶ 52 Pa. Code § 56.93(a)(1)

⁷ 52 Pa. Code § 56.94

⁸ Order at 3.

concerning UGI's compliance with the 3-day personal contact notice requirement prior to termination of service.⁹

I&E found through its informal investigation that UGI failed to comply with the 3-day notice on multiple occasions, terminating service of 3,345 residential customers between March 29 - 31, 2022, and an additional 612 terminations in April 2023.¹⁰ UGI attributes its failure to provide proper notice in advance of termination to issues with its contractor.¹¹

Additionally, UGI charged a reconnection fee to 1,883 customers in March 2022 and 74 customers in April 2023 prior to reconnecting service, even though the termination of service was not lawful.¹² In total, UGI's failure to comply with the Commission's regulatory requirements in advance of termination resulted in 3,957 households having gas service involuntarily and unlawfully terminated to their homes.

In addition to the calls placed resulting in termination, UGI's contracted auto-dialer service also initiated calls unrelated to service termination which resulted in 3,144 customers receiving Spanish-language voicemails.¹³

UGI subsequently refunded reconnection fees to all customers whose service was restored. In March 2023, UGI refunded \$155,198 in unlawfully collected reconnection fees to 1,883 customers impacted in the March 2022 Incident, and in September 2023 UGI refunded additional reconnection fees and security deposits totaling \$17,500 to the customers impacted by the April Incident.¹⁴

⁹ Order at 2.

¹⁰ Order at 6.

¹¹ Order at 3 and 4.

¹² Order at .6.

¹³ Order at 10.

¹⁴ Order at 6 and 7.

According to the Joint Petition, 182 affected customers from the March 2022 Incident were still without service as of February 2023.¹⁵ UGI claims these customers had not sought restoration. However, there is no indication in UGI and I&E’s Joint Petition indicating what, if any, additional follow up was conducted to reach these customers – nor is there any update in the reported information to determine whether these households sought to reconnect since February 2023.¹⁶ UGI restored service to all but 32 of the customers affected by the April 2023 Incident and provided a detailed list as to how cases were resolved for that Incident.¹⁷

Commission Staff and counsel for UGI conducted settlement negotiations that resulted in the proposed Settlement Agreement filed on March 24, 2025 – well over two years since the incidents first occurred. In addition to the corrective actions taken by UGI, the Settlement requires UGI to pay a \$90,000 civil penalty.¹⁸ The Settlement dictates that the civil penalty shall not be tax deductible pursuant to Section 162(f) of the Internal Revenue Code, 26 U.S.C.S. § 162(f) and shall not be passed through as an additional charge to UGI's customers in Pennsylvania.¹⁹

III. COMMENTS

CAUSE-PA submits that the civil penalty of \$90,000 assessed in this case is inadequate to address the likely harm caused by UGI’s failure to provide appropriate notice of termination, is insufficient to deter future violations, and requires additional modifications to more appropriately reflect the gravity of the errors on impacted individuals and to help ensure it will not happen again.

Specifically, we recommend the penalty be increased to no less than \$250,000, and that the entirety of the civil penalty be directed to support UGI’s Hardship Fund, known as Operation Share.

¹⁵ Order at 7.

¹⁶ Order at 7.

¹⁷ Order at 8.

¹⁸ Order at 10.

¹⁹ Order at 11.

Finally, we recommend that the Commission require UGI to conduct affirmative outreach to all impacted customers that remain without service to inform them of their options to reconnect service and the availability of universal service programming to assist.

The proposed \$90,000 does not adequately reflect the seriousness of the violation or the resulting financial harm to impacted families – many of whom are still without service. While we recognize that refunds for reconnection fees and security deposits were refunded to most of the impacted customers, it took several months to a year for those funds to be returned – placing additional strain on households that went without service, were charged additional upfront out-of-pocket payments, and who are without direct relief from the far-ranging consequences of UGI's actions to unlawfully terminate service to thousands of families. CAUSE-PA submits that the penalty assessed on UGI should be directed to this critical program, which is designed to provide financial relief to help remediate an acute financial hardship for households at risk of termination – the very households who were directly impacted by UGI's failure to provide required notice of termination.

The Commission has a formal policy statement establishing the standards to be considered in evaluating litigated and settled proceedings involving violations of the Public Utility Code and Commission regulations and determining whether a proposed fine is reasonable and in the public interest.²⁰ Section 69.1201 of the Commission's regulations sets forth ten factors that the Commission will consider in determining whether a fine is appropriate.²¹ When applied to settled cases, these factors are not applied in a strict fashion. Rather, settling parties should be afforded flexibility to reach an amicable resolution, so long as the Settlement is in the public interest.²²

²⁰ 52 Pa Code 69.1201.

²¹ Id.

²² Id.

While not required to be strictly applied given the proposed Settlement filed in this proceeding, the factors set forth in Section 69.1201(c) support CAUSE-PA's recommended revisions to the proposed Settlement agreement. We will address the relevant factors in turn, below:

i. Whether the conduct at issue was of a serious nature. (Section 69.1201(c)(1)).

The Company's conduct at issue was of a serious nature. While technical in nature, the Commission must not minimize the seriousness of the violation. As described in the Petition, the errors stemmed from a Daylight Savings Time setting used by a UGI vendor that "did not deploy properly" – resulting in calls placed to customers between 9 pm and 10 pm, several weeks after Daylight Savings Time.²³ Compounding the issue, on March 29-March 31, the vendor ran a system upgrade "designed to increase the vendor-dialer's calls-per-hour-service level" which also "failed to deploy properly" – resulting in calls not being placed at the right times or in sequential days.²⁴ Thereafter, when UGI's vendor manually remediated the issues, a setting "inadvertently" triggered the auto-dialer system to leave Spanish language voicemails when customers did not answer the phone.²⁵

This is not a matter of forgetting to turn the clock back after daylight savings, as the consequences are far more severe than waking up late.. Rather than carefully planning to increase out-bound call volume to appropriately handle the anticipated increase in terminations at the end of the winter moratorium, UGI's vendor rushed through updates to the calling system. As discussed further below, termination of essential utility services has far-ranging severe consequences for Pennsylvania families, and the job of delivering timely and appropriate notice of

²³ Petition at 5.

²⁴ Petition at 5.

²⁵ Petition at 5.

a pending termination is serious and should be treated with a far greater degree of care and attention than was demonstrated by UGI.

Notably, in addition to violating the Commission's regulations, UGI's actions may have also violated the federal Fair Debt Collections Practices Act (FDCPA), which prohibits debt collectors from contacting consumers after 9 p.m.²⁶ While we are not suggesting that the Commission has jurisdiction to enforce the FDCPA, we note the relevance of this Act in assessing the seriousness of UGI's actions.

- ii. Whether the resulting consequences of the conduct at issue were of a serious nature. (Section 69.1201(c)(2)).*

The consequences of the Company's conduct were serious. The Commission's regulations are carefully crafted to help ensure that customers receive notice in sufficient time to take action to stop the termination of life-essential services. The failure to provide appropriate notice of pending termination resulted in the erroneous termination of thousands of customers, and the consequences to those customers were never fully addressed.

Time is of the essence to prevent the loss of gas to the home and a host of other consequences to health, safety, and stability that follow. Once service is off, consumers are often faced with insurmountable up-front costs to restore service, as their right to a payment arrangement or to seek enrollment in a universal service program changes after service is off.²⁷ The proposed Settlement notes that, following the March 2022 Incident, 2,628 were reconnected by August 2022 and an additional 534 were reconnected by February 2023.²⁸ It also indicates that, following the April 2023 Incident, 580 of the 612 impacted customers were able to reconnect sometime between

²⁶ FDCPA Section 805(a)(1) (Communication in Connection with Debt Collection).

²⁷ See 52 Pa. C.S. 56.191(c) (setting forth the restoration payment arrangement standards).

²⁸ Order at 7-8, Petition at 10-11.

April 2023 and August 2024.²⁹ However, it does not address the terms of reconnection imposed on these households – nor does it describe whether more lenient reconnection terms were offered to the 214 impacted customers whose service has remained off since the errors initially occurred in March 2022 and April 2023.

CAUSE-PA is particularly concerned about the lack of detail regarding the length of time that impacted households remained without service following UGI’s failure to provide appropriate notice. Based on the settlement documents, 2,628 impacted customers were without service for as long as 4 months (April to August), and an additional 564 impacted customers were without service for as long as 11 months (April to February). Based on these facts, we are deeply concerned that many of the customers impacted by UGI’s actions were without critical gas service to heat their home in winter.

Importantly, UGI’s actions likely had a disproportionate impact on low income families, as low income customers carry disproportionately high levels of arrears and are more likely to be at risk of termination.³⁰ However, nothing in the proposed Settlement indicates whether UGI took steps to identify impacted low income customers or to connect those households with available universal service programs.

Failure to properly notify consumers of a pending termination deprives the consumer of critical time with which to avoid the shut-off, and further compounds the financial consequences to individual consumers, increases uncollectible expenses, and negatively impacts the health, safety, and stability of low income families and other vulnerable households. These consequences are most severe for low income seniors, families with young children, and individuals with a

²⁹ Order at 8, Petition at 11.

³⁰ Pa. PUC, BCS, 2023 Report on Universal Service and Collections Performance (Sept. 2024), [2023_universal_service_report-final_rev041525.pdf](#).

disability. When service is involuntarily terminated, households are exposed to unsafe temperatures, which can create or exacerbate health conditions, and disrupts family unity.³¹ Young children in households experiencing energy insecurity are also more likely to face housing and food insecurity.³² Children in families facing energy insecurity have greater odds of poor health and developmental problems.³³ The lack of water heating can also prevent proper sanitation and hygiene,³⁴ And, when a family cannot use their stove to prepare meals at home, it adds significant costs to purchase prepared food. Following involuntary termination, renters often face eviction and/or termination of public housing assistance. Involuntary termination is also a common catalyst to homelessness, as inability to reconnect to service at a new address can form the basis for denial of public or private housing.³⁵

Involuntary terminations are also dangerous to the physical safety of the household and their surrounding community. When a family is unable to use a primary heating system, they often resort to dangerous, high usage / high cost heating methods – such as electric space-heaters, electric stoves, and/or portable generators – which increases the risk of carbon monoxide poisoning and house fires.³⁶ Heating equipment is a leading cause of fires in U.S. homes.³⁷ Space heaters are

³¹ National Consumer Law Center, Protecting Seriously Ill Consumers from Utility Disconnections, at 5 (2022), available at: <https://www.nclc.org/resources/report-protecting-seriously-ill-consumers-from-utility-disconnections-what-states-can-do-to-save-lives-now/> .

³² *Id.* at 6.

³³ Rosenberg J, Rosenthal A, Castillo S, Edwards E, Erickson C, Nogelo P, Fenick AM. Medical Certification for Utility Shut-Off Protection and Health-Related Social Needs. Pediatrics. (2022) available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9647589/> .

³⁴ Zhang X, Warner ME, Grant M. Water Shutoff Moratoria Lowered COVID-19 Infection and Death Across U.S. States. Am J Prev Med. (2022), available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8433038/> .

³⁵ See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>.

³⁶ Richard Campbell, Home Heating Fires, National Fire Protection Association (NFPA), (Jan. 2021), available at: <https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Heating-equipment>

³⁷ *Id.*

most often responsible for home heating equipment fires, accounting for more than two in five fires, as well as the vast majority of the deaths and injuries in home fires caused by heating equipment.³⁸

There is no indication in the proposed Settlement that UGI or I&E took these serious and substantial consequences into account when setting an appropriate penalty or directing remediation for impacted customers that were not provided the required notice in advance of termination. To the contrary, it took nearly a year for UGI to refund unlawfully collected reconnection fees following the March 2022 Incident – and five months to refund unlawfully collected reconnection fees following the April 2023 Incident. The imposition of reconnection fees likely lengthened the time that many impacted customers went without service, compounding the negative consequences of UGI’s actions on low income and other vulnerable households.

- iii. Whether the regulated entity made efforts to modify internal practices and procedures to address the conduct at issue and prevent similar conduct in the future. (Section 69.1201(c)(4)).*

UGI made clear efforts to modify its internal practices and implement corrective measures to its auto-dialing system that is managed by a contracted third-party vendor. These efforts certainly warrant recognition in setting an appropriate penalty. Nevertheless, the fact that additional errors occurred in April 2023 – a year after the initial March 2022 Incident occurred – indicates that UGI’s corrective actions were insufficient to prevent the issues from occurring again.

While UGI was aware of the initial dialer issues on April 4, 2022, just a few days after March 2022 Incident,³⁹ there is no indication in the proposed Settlement that UGI took any action

³⁸ Id.

³⁹ Order at 6, Petition at 9-10.

to reach out to impacted consumers or refund unlawfully collected reconnection fees until after the BCS identified the issues and I&E initiated its investigation. To the contrary, it appears from the Petition that UGI only took action to reach out to a small portion (134) of the impacted customers after BCS “strongly encouraged” UGI to do so.⁴⁰ The Petition indicates that UGI sent a letter to these 134 customers, though is not clear what that letter contained beyond a vague request that the customer “contact UGI.”⁴¹ There is no indication in the Petition to indicate that UGI ever reached out directly to the thousands of other impacted customers.

iv. The number of customers affected and the duration of the violation. (Section 69.1201(c)(5)).

As discussed, thousands of UGI customers were impacted, and the harm to those customers spanned over many months – and for some is ongoing. In total, 3,957 households were affected by UGI’s errors occurring in two incidents, discovered 13 months apart.⁴² Several thousand more were impacted by a third incident related to UGI leaving erroneous Spanish language voicemails for consumers.⁴³ While many of these customers were later able to reconnect to service, the Petition suggests that customers impacted by the March 2022 Incident may have been without service for as long as 11 months (April 2022 to February 2023), and customers impacted by the April 2023 Incident may have been without service for as long as 16 months (April 2023 to August 2024).⁴⁴ Again, 212 customers impacted by the March 2022 and April 2023 Incidents are still without service.

⁴⁰ Petition at 6.

⁴¹ Petition at 6.

⁴² UGI reported that the Company discovered another issue with the auto-dialer in April 2023 after conducting a manual audit. The Company does not indicate when the incidents occurred. See Order at 5.

⁴³ Petition at 10.

⁴⁴ Order at 7-8, Petition at 10-11.

Notably, UGI eventually refunded reconnection fees unlawfully collected from impacted customers; however, this action was also delayed. The Company did not fully refund reconnection fees collected from customers impacted by the March 2022 Incident until March 13, 2023 – nearly a year after those fees were initially assessed. In turn, the Company did not fully refund reconnection fees collected from customers impacted by the April 2023 Incident until September 7, 2023 – five months after the incident occurred. There is no explanation offered to justify this lengthy delay.

- v. *Whether the regulated entity cooperated with the Commission's investigation. (Section 69.1201(c)(7)).*

The Petition indicates that UGI cooperated with the Commission’s investigation.

- vi. *The amount of the civil penalty or fine necessary to deter future violations. The size of the utility may be considered to determine an appropriate penalty amount. (Section 69.1201(c)(8)).*

The proposed civil penalty in this case is just \$90,000. This amounts to roughly \$22 for each unlawful termination. CAUSE-PA submits that this level of penalty is not adequate to appropriately reflect the seriousness of UGI’s violation – or to deter future violations. UGI is now the largest gas utility in the state, serving over 600,000 residential customers and collecting over \$700 million in residential revenues each year.⁴⁵ Given the gravity of the issue, and the relative size of UGI, we believe a stronger civil penalty is warranted to help deter future violations by UGI or other large utilities. Involuntary termination of life sustaining service is a severe penalty for nonpayment, with severe consequences that cause a cascade of far-reaching consequences to individuals and communities. When a utility resorts to termination, it must be the last resort – and only after compliance with all due process requirements, inclusive of meeting the legally required

⁴⁵ 2023 Universal Service and Collections Performance Report at 37.

notice. As discussed, by failing to provide appropriate notice, UGI deprived consumers of critical time necessary to seek relief to avoid the shut off and truncated their ability to access various rights that attach only prior to termination. For these reasons, we recommend that the Commission modify the settlement and increase the civil penalty to \$250,000.

vii. Past Commission decisions in similar situations.

The Commission recently amended a proposed Settlement between I&E and PPL Electric, and ordered a civil penalty of \$1M be directed to support PPL's Hardship Fund, known as Operation Help. Like UGI's Operation Share, Operation Help provides grant assistance to low and moderate income households facing an acute financial hardship to prevent a pending termination. In their Joint Motion amending the proposed Settlement, Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss explained: "[G]iven that financial impacts may still be affecting customers, particularly PPL's more vulnerable customers, it would be reasonable to direct funds to the Company's Hardship Fund."⁴⁶

As in the PPL case, there are still over 200 consumers impacted by the March 2022 and April 2023 Incidents that have not yet reconnected to service. Directing the civil penalty to support UGI's Hardship Fund will help to ensure that impacted households and those who are similarly situated can prevent termination and avoid the related consequences. Expanding the availability of Hardship Fund assistance also helps to decrease collections costs and uncollectible expenses, which in turn benefits all residential customers. CAUSE-PA thus strongly encourages the Commission to consider the direct public interest benefits to be achieved by directing penalty funds to Operation Share.

⁴⁶ Pa. PUC v. PPL Electric Utilities Corp., Joint Motion of Chairman Stephen M. DeFrank & Commissioner Kathryn L. Zerfuss, Docket No. M-2023-3038060 (April 25, 2024).

IV. CONCLUSION

For the foregoing reasons, CAUSE-PA submits that the Commission must exercise its authority to modify the proposed Settlement to ensure that it more adequately accounts for the consequences of UGI's failure to provide appropriate notice of termination. Specifically, we recommend the Commission increase the penalty to no less than \$250,000 and direct proceeds to UGI's Hardship Fund, Operation Share. In turn, the Commission should require UGI to send a letter to all impacted customers that are still without service and invite them to apply for a Hardship Fund grant or other universal service programs that may help to facilitate their reconnection.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT

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