



August 12, 2025

Via Electronic Filing

Secretary Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street, PO Box 3265
Harrisburg, PA 17105-3265

**Re: UGI Utilities, Inc. Universal Service and Energy Conservation Plan for 2026 - 2030,
Docket Nos. M-2025-3054362, M-2025-3054366, P-2025-3054381**

Request for Extension of Comment Period

Dear Secretary Homsher,

On July 24, 2025, the Commission issued an Order in the above noted proceeding requiring UGI Utilities, Inc. to file supplemental information within 20 days regarding various aspects of UGI's proposed Universal Service and Energy Conservation Plan for 2026-2030. Thereafter, the Commission established a 30-day period for public comment.

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) respectfully requests a 20-day extension of the initial comment period, which would bring the close of initial comments to October 6, 2025.

Counsel for CAUSE-PA has numerous conflicts during the initial comment period that will make it difficult to thoroughly review and respond to the critical and complex issues in this proceeding. Chief among these conflicts are multiple competing litigation schedules, with statutorily determined filing dates. Counsel for CAUSE-PA also has internal staffing constraints during this same timeframe that will impair our ability to thoroughly review and respond to the UGI's USECP, the Commission's Order, and UGI's supplemental data and information.

CAUSE-PA notes that this proceeding is not subject to the statutory and regulatory timeframe constraints of the currently active rate case proceedings and does not believe that an additional 20 days would prejudice any party – nor would it substantially impact the timeline for a final decision in this proceeding. Instead, a brief 20-day extension of the public comment period will help ensure adequate time for review of UGI's nuanced plan, without adding significantly to the Commission's timeframe for review.

CAUSE-PA consulted with the Office of Consumer Advocate (OCA) and UGI in advance of filing this request, and it is our understanding that OCA is supportive of the request and UGI is unopposed.

We appreciate the Commission's consideration of this request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L.N. Berman", with a horizontal line extending to the right.

Lauren N. Berman, Esq.
Counsel for CAUSE-PA

CC: Certificate of Service

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

UGI Utilities, Inc. – Gas Division Universal Service and Energy Conservation Plan for 2026-2030 : Docket No. M-2025-3054362
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UGI Utilities, Inc. – Electric Division Universal Service and Energy Conservation Plan for 2026-2030 : Docket No. M-2025-3054366
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UGI Utilities, Inc. – Gas Division Petition for Limited Waiver of 52 Pa. Code § 58.10(a)(1) and 58.11(a) : Docket No. P-2025-3054381
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CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Letter, Request to Extend Comment Period** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL

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