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August 25, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: UGI Utilities, Inc. - Gas Division and UGI Utilities, Inc. - Electric Division
Universal Service and Energy Conservation Plan for 2026-2030
Docket Nos. M-2025-3054362, et al.**

Dear Secretary Homsher:

Enclosed for filing are the responses of UGI Utilities, Inc. – Gas Division and UGI Utilities Inc. – Electric Division (collectively, “UGI”) to the Pennsylvania Public Utility Commission’s (“Commission”) requests for supplemental information, as directed by the Commission’s Order Directing Supplemental Information and Establishing Comment Period entered July 24, 2025, in the above-captioned proceeding.

Copies of this filing are being served per the enclosed Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Enclosures

cc: Certificate of Service
Nathan Froehlich, BCS (via Email nfroehlich@pa.gov)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Dated: August 25, 2025



Devin T. Ryan

Responses to the Commission’s Requests for Supplemental Information
UGI Utilities, Inc. USECP for 2026-2030
Order Entered July 24, 2025
Docket Nos. M-2025-3054362, M-2025-3054366, and P-2025-3054381

A. Program Descriptions as Proposed for 2026-2030

1. CAP

a. Accepting 30 Days or 12 Months of Income:

- *Clarification Required:* UGI is directed to clarify the timeframes in which income documentation for its CAP will be accepted. (Order at 13.)

Response: The timeframe is relative to the date of the application, and is specified for each type of income documentation listed in the Plan:

- **Pay Stub** – Last 30 days or most recent 12 months of pay stubs (to the extent available) are considered the most current income information provided.
- **W2** – Prior calendar year representing a full year of work (or if not a full year of work, income will be annualized based on the information provided in the W2).
- **1040 / Tax Form** – Must be for tax period ending the year prior to application date.
- **Bank statement** – Last 30 days (to the extent available).
- **Statement from DHS** – Last 30 days.
- **Benefit letter such as social security, pension, disability, or SSI** – Prior year letter if current award letter is not yet available.
- **Unemployment determination letter** – approval letter that reasonably aligns with the date of the application.
- **Notarized letter (e.g., freelance, intermittent or seasonal work)** – dated within 30 days of application.
- **Zero income form** – submitted within 30 days of date of the application.

b. Average Bill:

- *Clarification Required:* UGI is directed to clarify whether it uses the average bill from the prior tenant in cases where the customer does not have 12 months of historical usage at the residence, but where 12 months of historical usage from the prior tenant is available. (Order at 13.)

Response: In such a circumstance, the Company considers usage for the residence, which would include the prior tenant within the relevant historic 12-month period. If there was no prior tenant, then the average residential bill is based on all residential customers. A CAP customer’s average bill differs by customer and premises.

- *Clarification Required:* Additionally, UGI is directed to clarify whether it has conducted any assessments to determine whether average usage for previous tenants or all residential customers is more accurate once the 12-month usage for

the CAP customer is later determined. If UGI has conducted such an assessment, UGI is directed to provide its results. (Order at 13-14.)

Response: The Company has not conducted an assessment to determine whether average usage for previous tenants or all residential customers is more accurate once the 12-month usage for the CAP customer is later determined. However, due to the fact that usage is specific to the age, structure, and condition of the home, it is more accurate to use the prior tenant's consumption at the same service address.

c. Identification Documentation:

- *Clarification Required:* UGI is directed to clarify whether it will verify the identity of just the CAP applicant or all household members. (Order at 14.)

Response: Verification is of the account holder; if there's a co-responsible party applying for CAP then verification of identity is required for all co-responsible parties that are applying.

d. Common Application Form:

- *Clarification Required:* UGI is directed to clarify whether it intends to modify its CAP application consistent with the CAF data elements within the duration of its 2026 USECP. (Order at 16.)

Response: The Company plans to use the Common Application Form, with slight modifications. This provision was agreed upon as part of the 2025 Gas Base Rate Case Settlement, Paragraph 59(a) at Docket Nos. R-2024-3052716, et al.¹ A Recommended Decision ("RD") was issued on August 8, 2025, recommending approval of the Settlement without modification. The RD is pending before the Commission as of August 25, 2025.

- *Clarification Required:* If UGI does not intend to modify its CAP application consistent with the CAF data elements, it is directed to explain its reasons. (Order at 16.)

Response: See the prior response.

e. Online Application:

- *Clarification Required:* UGI is directed to explain whether it is working on an online application for CAP and other universal service programs. UGI should provide a timeline for any work under consideration. (Order at 17.)

Response: Preliminary estimates for developing an online CAP application are between \$5.5-\$6.5 million and would take approximately 2-3 years to complete. There are no plans to implement it at this time. Assurance of full and current cost recovery would be required before incurring these costs. Customers can download the CAP application online and email a completed copy along with associated documentation to the CBO or the Company.

¹ UGI plans to file a revised USECP after the 2025 Gas Base Rate Case Settlement is approved by the Commission. The revised USECP would incorporate the changes required under that Settlement.

- *Clarification Required:* If UGI does not intend to implement an online CAP application consistent with the CAP Policy Statement (2020), it is directed to explain its reasons. (Order at 17.)

Response: Please see response above.

f. UGI Electric CAP Automatic Enrollment:

- *Clarification Required:* UGI is directed to clarify whether auto-enrolled customers are still required to recertify within one year if they have provided income documentation to lower their CAP payment amount. (Order at 19.)

Response: No, customers in this circumstance would not need to recertify because receipt of LIHEAP would serve as income verification. The 12-month recertification window will depend on the last time income was received from the customer. For example, if a customer provided income documentation to lower their CAP payment amount, before the 12-month period expires, it would restart the one-year recertification period.

- *Clarification Required:* Additionally, UGI is directed to provide a copy of its CAP auto-enrollment letter and explain whether it provides additional means of notification (e.g., text, phone call) to educate auto-enrolled customers about CAP. (Order at 19.)

Response: The Company sends these letters through USPS to notify UGI Electric customers of auto-enrollment. Please see **UGI Attachment 1** for a copy of the letter.

- *Clarification Required:* UGI is further directed to provide information on its opt-out process, including how much time electric customers have to opt out of auto-enrollment and what actions they must take. (Order at 19.)

Response: Please see UGI Attachment 1. The Company provides 2-3 weeks (e.g. considering the impact of holidays) to opt-out (email, call in). If the customer does not opt-out within allowed time frame, the customer will be auto-enrolled in CAP, but the Company will remove the customer from CAP, upon request, at any time.

- *Clarification Required:* UGI must also identify the number of electric customers that have been auto-enrolled in CAP. Of those auto-enrolled customers, UGI is directed to identify:

- The number who provided income documentation to change their CAP payment amount after enrollment.
- The number paying the average bill, PIP amount, and minimum payment amount.
- The number who have opted out of CAP within the established timeframe.
- The number who have attempted to opt out of CAP after the opt-out period had elapsed.

(Order at 19-20.)

Response: 635 electric customers have been auto-enrolled in CAP. Of those auto-enrolled customers:

- 14 customers provided income after auto-enrollment from the winter of 2023 to present.
 - 315 customers are paying the average bill, 245 customers are paying the PIP, and 43 customers are paying the minimum payment.
 - 84 customers opt-out of CAP within the established timeframe.
 - 17 customers opted out of CAP after the opt-out period.
- *Clarification Required:* Finally, UGI is directed to identify the impact on payment behavior and collection activity for electric customers auto-enrolled in CAP. (Order at 20.)
 - *Response:* 603 customers were auto enrolled into CAP, 433 are still enrolled, and 45% have unpaid CAP bills that are 30 days or older.

g. Use of LIHEAP Data Sharing:

- *Clarification Required:* UGI is directed to explain what additional information beyond what is provided through LIHEAP data sharing customers need to provide to determine their eligibility for both LIURP and Operation Share. (Order at 21.)

Response: Per Paragraph 59(c) of the 2025 Gas Base Rate Case Settlement, “The Company will no longer require applicants for its CAP, Low Income Usage Reduction Program (‘LIURP’), or Operation Share programs to produce income documentation if the applicant (1) received a LIHEAP grant within the current or prior LIHEAP season and (2) are included within the LIHEAP data shared by DHS. UGI Gas will update all relevant applications and communications to inform applicants of this documentation waiver.” However, customers must still meet the relevant program’s criteria. For LIURP, customers must have usage exceeding stated thresholds; for Operation Share, customers must have a hardship – e.g., death of major wage earner, have past due balances, termination notice, etc. For Electric customers, if LIHEAP is on the account, customers do not have to provide income so long as they meet program requirements.

h. Opt-in for Universal Service Programs:

- *Clarification Required:* UGI is directed to describe the process by which it plans to communicate to customers who agree to share their income and household information with UGI through a LIHEAP application their ability to opt into CAP enrollment. This explanation must detail what communication methods it will utilize to ask customers whether they like to opt into CAP and include a copy of the proposed letter, text, or script that will be used to convey this information to the customers. (Order at 22.)

Response: Please see **UGI Attachments 2a and 2b** for examples of the opt-in solicitation email and letter sent to LIHEAP recipients to encourage CAP enrollment.

i. Recertification Notices:

- *Clarification Required:* UGI is directed to clarify whether or not it has or is developing a process to stop sending CAP recertification reminders if the customer has already submitted their recertification information. (Order at 24.)

Response: Yes, the Company has developed a process to stop sending CAP recertification reminders once the customer provides income information and it is entered in the system.

- *Clarification Required:* We also direct UGI to identify what methods of delivery, besides paper, it uses or plans to use to send recertification notices (e.g., text, email).

Response: Email is used, when available, to remind customers to recertify.

j. Voluntary Removal from CAP:

- *Clarification Required:* UGI is directed to clarify all circumstances under which a customer who has voluntarily removed them-selves from CAP can be reinstated in the program. This policy will need to be consistently applied throughout the Proposed 2026 USECP. (Order at 26.)

Response: If a customer requests removal from CAP due to seasonal bill fluctuations, there is a 12 month wait to be reinstated / reenrolled into CAP. If there is a PUC payment arrangement available with a longer term than what is being offered through the CAP, then the customer will be allowed to reenroll without waiting 12 months. If a customer is moving into another premises served by UGI, the move must be completed within 30 days. If over 30 days, then the customer must re-enroll at an agency. If a customer is moving into a premises outside of UGI's service territory, then the removal would be processed. If the customer then returns to a premises within UGI's service territory, the customer can reenroll in CAP provided they meet program requirements.

- *Clarification Required:* Additionally, UGI is directed to clarify when the 12-month waiting period starts (e.g., on the date the customer was removed or requested removal, on or after the next billing cycle, etc.) and how this policy complies with the Commission's directive in the August 2019 Order. (Order at 26.)

- *Response:* The 12-month waiting period starts on the date the removal is processed. A customer will be permitted to re-enroll if they satisfy the CAP amount covering both the missed CAP payments while on CAP and the month(s) the customer spent out of the program (i.e., the CAP catch-up amount), plus any applicable reconnection fees to restore service. The circumstances are: (1) a customer voluntarily removes themselves from CAP for seasonal short-term benefit; (2) a previous participant would have their account reviewed to assure the reason for prior default has been cured or the customer has been out of the program for a minimum of 12 months for a voluntary removal; (3) if a customer requests voluntary removal from CAP for the reason that their seasonal usage bills total less than the monthly CAP amount, the customer will be removed from the program, forfeit all benefits, and be required to remain out of the program for 12 months before they can reapply; or (4) if CAP is no longer a benefit to the customer and they choose to be removed. There is no 12-month wait to reapply for circumstances 2-4.

k. Obligation to Participate in Other Weatherization Services:

- *Clarification Required:* UGI is directed to clarify how it enforces the requirement that customers must participate in non-LIURP weatherization services offered through local and state weatherization agencies. (Order at 26.)

Response: The Company does not have the authority to enforce participation in non-LIURP weatherization services offered through local and state weatherization agencies. CBOs provides education to customers with high usage and recommend participation in other weatherization programs. The Company is not removing customers from CAP if they do not participate in non-UGI weatherization programs. However, if a customer has high usage, and refuses LIURP services, the customer can be removed from CAP for failure to participate in LIURP. Accordingly, the Company has no way to enforce if customers participate or refuse to participate in non-UGI weatherization programs.

- *Clarification Required:* Additionally, UGI is directed to identify how many customers had been removed annually from CAP in 2023 and 2024 for (1) failing to participate in LIURP; and (2) failing to participate in other weatherization services. (Order at 26.)

Response: There was 1 customer removed from CAP for failure to participate in LIURP for the period January 1, 2023, through December 31, 2024. The Company is not tracking failure to participate in non-UGI weatherization services, as the Company does not remove customers from CAP for that reason.

l. LIURP and High Usage Controls:

- *Clarification Required:* UGI is directed to identify whether it allows any exceptions to its requirement that CAP customers must participate in LIURP and comply with high usage controls. UGI is also directed to report the number of customers removed from CAP for refusal to participate in LIURP or comply with high usage controls from 2022 through 2024. (Order at 27.)

Response: If a customer is prohibited from participating in LIURP due to the landlord's refusal of LIURP services, or if the customer has extenuating circumstances that prohibit reducing usage (e.g., medical equipment, added people to the household, household occupants under 5 years or over 62 years of age), an exception would be considered to the reducing usage criteria. The number of customers removed from CAP for failure to reduce usage from January 1, 2022, through December 2024 was 7; as previously stated, 1 customer was removed from CAP for failure to participate in LIURP.

- *Clarification Required:* Additionally, UGI is directed to provide copies of the letter sent to customers to notify them that they have been removed from CAP for failing to participate in LIURP or comply with usage controls. (Order at 27.)

Response: Please see **UGI Attachments 3a and 3b** for copies of the letters sent out to customers to notify of their CAP removal for failure to participate in LIURP.

m. Security Deposits:

- *Clarification Required:* UGI is directed to detail its security deposit procedures and how these practices are compliant with the relevant statutes and regulations. (Order at 28.)

Response: In addition to Rules 3.3, 3.4, 3.5(b)-(c), 3.6, 3.8, 3.9, and 3.10(b)-(c) of UGI Gas’s tariff and Rules 3-c, 3-d, 3-e(ii)-(iii), 3-f, 3-h, 3-i, and 3-j(ii)-(iii), please see the following.

- Establish creditworthiness –
 - Credit eligibility for new applicants for service is determined through a third-party credit bureau.
 - Payment history, including adherence to payment arrangements and record of theft of service or fraud, is systematically evaluated to determine credit eligibility of previous UGI customers.
- Determining Security Deposit Amount –
 - If creditworthiness is insufficient, security deposits are calculated by the customer billing system based upon the customer classification.
 - Customers are assessed a deposit that does not exceed two times the average bill of the premises in accordance with Rule 3.4 of UGI Gas’s tariff and Rule 3-d of UGI Electric’s tariff.
 - The deposit amount is communicated verbally to the customer by a customer service representative.
 - A residential customer may elect to pay the required deposit in three installments in accordance with Rule 3.5 of UGI Gas’s tariff and Rule 3-e of UGI Electric’s tariff.
- Waiving Security Deposits –
 - Customers who also express an inability to pay the deposit due to household income are sent a letter providing them with instructions to have their income verified to be less than 150% of Federal Poverty Levels (FPL). However, customers who have previously had their income verified to be less than 150% FPL in the past 12 months will have their deposit waived, without the need to verify income again and are not quoted the security deposit.
 - Upon income verification, any previously fully or partial paid deposits are automatically refunded to the customer, with any accrued interest, by the customer billing system. Any unpaid deposit charges are automatically reversed by the customer billing system.
 - Pending Commission approval of the Settlement in the 2025 Gas Base Rate Case, the following settlement provisions set forth in Paragraph 65(a) will be implemented for gas

customers: “The Company will add the following language within its gas service tariff related to the Company’s current practice of not collecting deposits from low income verified customers. This language will be consistent with language as stated in Title 52 Chapter § 56.32.(e) Security and cash deposits. “The Company may not require a cash deposit from an applicant who is, based upon household income, confirmed to be eligible for a customer assistance program. An applicant is confirmed to be eligible for a customer assistance program by the Company if the applicant provides income documents or other information attesting to his or her eligibility for state benefits based on household income eligibility requirements that are consistent with those of the Company’s customer assistance programs. For existing customers that already have monies paid against a security deposit and become enrolled in the Company’s customer assistance programs, the Company will provide the customer a direct refund of the security deposit amount, along with applicable interest. The Company may apply the refund of the security deposit amount, with applicable interest, to the customer’s account balance with the customer’s informed consent.”

- Accruing Interest –

- As stated in Rule 3.9 of UGI Gas’s tariff, and Rule 3-i of UGI Electric’s tariff, “Deposits from all Customers shall bear interest computed at the simple annual interest rate determined by the Secretary of Revenue for interest on underpayment of tax under Section 806 of the Act of April 19, 1929 (P.L. 343, No. 176), known as The Fiscal Code which will be credited annually to the Customer’s deposit or account.”

- Refunding Security Deposit–

- Aside for the situations discussed above, security deposits for customers are held for a minimum of 12 months from the date the deposit was fully paid. Upon 12 billing periods of consecutive on-time payments, the customer billing system will automatically apply the amount of their security deposit plus accrued interest, to their next bill.
- *Clarification Required:* UGI is also directed to clarify what notifications, if any, customers receive when determined to be eligible for a security deposit refund. (Order at 28.)

Response: Upon 12 billing periods of consecutive on-time payments, the customer billing system will automatically apply the amount of their security deposit plus accrued interest, to their next bill.

n. CAP Final Billing:

- *Clarification Required:* UGI is directed to clarify its current CAP final billing policy and explain how the procedure changes in cases of voluntary versus involuntary termination of service. UGI is also directed to address how its CAP final billing practices reflect compliance with the relevant statutes and regulations as discussed in the CAP Final Billing Order. (Order at 30.)

Response: If a CAP customer's service is terminated, the customer remains eligible for restoration, if he/she pays all missed CAP bills. This option is available for up to 109 days after service is terminated. Once the CAP "catch-up" amount is paid (within that 109 day period), the customer will receive the associated CAP credits and pre-program arrearage ("PPA") forgiveness owed.

For the UGI Companies, the final bill always includes the full remaining PPA balance (as a separate line item on the bill) and the Company believes this is the most reasonable approach. Specifically, if a CAP customer requests a voluntary discontinuance of service, their final bill will reflect a full "walk-away" state. This would include any remaining PPA balance as a separate line item. It would also show any non-PPA account receivable balance.

If the account was terminated for non-payment, the final bill would similarly reflect a walk-away state (PPA and non-PPA balances). However, the customer remains eligible to be restored, if he/she pays all missed CAP bills (i.e., the unpaid balance that the customer accrued while on CAP). This option is available to the customer for up to 109 days after their service was terminated and they were removed from CAP. Once the customer pays this "catch-up" amount (within the allotted 109 day period) he/she will receive the associated PPA forgiveness owed.

o. CAP Credit Expenditures for UGI Electric:

- *Clarification Required:* UGI is directed to explain how its proposed high usage threshold would control or reduce CAP credit costs for UGI Electric. (Order at 36.)
- *Response:* The proposed high usage threshold aligns with the actual 12-month usage of electric customers currently enrolled in CAP. Based on data provided in response in the "High Usage Threshold" section below, the current threshold shows 212 electric CAP customers would be referred to LIURP, whereas the proposed threshold shows 261 electric CAP customers would be referred to LIURP. Therefore, the proposed high usage threshold would allow more customers to be referred to LIURP, which may lower usage for electric CAP customers. The higher usage threshold would likely reduce the number of LIURP referrals, which ultimately could increase bad debt.
- *Clarification Required:* Additionally, UGI is directed to provide recommendations for new CAP credit limits to inform the Commission in the event the Commission determines that maximum CAP credit limits should be reinstated for UGI Electric. The recommendations must be tiered based on FPIG level (i.e.,

0-50%, 51-100%, and 101-150%) and account type (i.e., electric heating, electric non-heating). (Order at 36.)

Response: The Company performed the analysis requested in the questions below by updating the 2014 Max CAP Credit for UGI Electric Heating (\$1,200) and Non-Heating (\$700) based on the incremental generation and distribution rate changes from 2016 to present, resulting in a Max CAP Credit for Heating of \$1,969 and \$1,149 for Non-Heating. Please see Table 1 below. The \$1,969 Max CAP Credit aligned with an 84% subsidy rate based on the 70%, 80% and 90% FPL analysis shown in Table 2 below.

Regarding the Company's analysis and proposed recommendation, assuming an 84% subsidy Max CAP Credit threshold, approximately 714 CAP customers would exceed the threshold and be required to pay \$847,826 at an average cost of \$1,187 per CAP customer exceeding the Max CAP Credit. Additionally, customers paying the USP rider would receive a minimal annual credit (estimated \$5.06). For purposes of estimating, the Company utilized a 70% default rate as the Company believes a significant percentage of these CAP customers that have exceeded the Max CAP Credit would default and ultimately have service terminated impacting bad debt expense. Please see Table 3 below for the details by customer segment. Additionally, there are significant IT system enhancements that would be required to facilitate such a change, as the Max CAP Credit was removed per Commission order before the Company implemented its new customer billing system in 2017. The Company has not determined the cost or the time to implement such changes. Therefore, the Company does not recommend reimplementing a Max CAP Credit given the Commission's direction at Docket No. M-2013-2371824, in which the Company was ordered to remove the Max CAP Credit.

- *Clarification Required:* In addition, UGI is directed to provide:
 - CAP credit limits based on the percentage of rate and default electric price increases since UGI Electric's previous CAP credit limits were eliminated.
 - CAP credit limits needed to address the subsidization needs of 70%, 80% and 90% of UGI Electric's CAP customers.
 - All recommendations and projections should include the potential impact of CAP credit limits on monthly bills for UGI Electric CAP and non-CAP customers.

(Order at 36.)

Response:

- Please see Table 1 below for CAP credit limits based on the percentage of rate and default electric price increases since UGI Electric's previous CAP credit limits were eliminated:

Table 1

Electric Default and Base Rate Distribution Residential Charges					Calculated Electric Max CAP Credit Based on Residential YOY Rate Increases	
Date	Generation	Distribution	Total	% YOY Increase	Max Credit Heating	Max Credit Non-Heating
6/1/2025	\$ 11.47	\$ 5.29	\$ 16.76	6%	\$ 1,969	\$ 1,149
6/1/2024	\$ 10.53	\$ 5.29	\$ 15.82	5%	\$ 1,858	\$ 1,084
6/1/2023	\$ 11.08	\$ 3.91	\$ 14.99	-11%	\$ 1,761	\$ 1,027
6/1/2022	\$ 12.90	\$ 3.91	\$ 16.81	84%	\$ 1,975	\$ 1,152
6/1/2021	\$ 6.33	\$ 2.81	\$ 9.14	-5%	\$ 1,074	\$ 626
6/1/2020	\$ 6.81	\$ 2.81	\$ 9.62	4%	\$ 1,130	\$ 659
6/1/2019	\$ 6.45	\$ 2.81	\$ 9.26	-8%	\$ 1,088	\$ 635
6/1/2018	\$ 7.22	\$ 2.81	\$ 10.04	11%	\$ 1,179	\$ 688
6/1/2017	\$ 6.21	\$ 2.81	\$ 9.03	-12%	\$ 1,060	\$ 619
6/1/2016	\$ 7.40	\$ 2.81	\$ 10.22		\$ 1,200	\$ 700

- Please see Table 2 below for Max CAP Credits needed for subsidization of 70%, 80%, and 90% separated by account type.

Table 2

SUBSIDY ELECTRIC HEATING ANALYSIS							
FPL 50 - HEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 1,245	\$ 1,010	\$ 1,065	\$ 1,727	\$ 2,185	\$ 1,860	\$ 1,924
80%	\$ 1,585	\$ 1,295	\$ 1,373	\$ 2,249	\$ 2,810	\$ 2,395	\$ 2,485
90%	\$ 2,100	\$ 1,772	\$ 1,930	\$ 3,140	\$ 3,825	\$ 3,260	\$ 3,408
FPL 100 - HEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 1,125	\$ 938	\$ 960	\$ 1,402	\$ 1,750	\$ 1,475	\$ 1,542
80%	\$ 1,450	\$ 1,230	\$ 1,266	\$ 1,840	\$ 2,265	\$ 1,985	\$ 2,030
90%	\$ 1,945	\$ 1,710	\$ 1,784	\$ 2,608	\$ 3,105	\$ 2,885	\$ 2,866
FPL 150 - HEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 1,040	\$ 805	\$ 782	\$ 1,237	\$ 1,280	\$ 1,100	\$ 1,206
80%	\$ 1,400	\$ 1,076	\$ 1,080	\$ 1,724	\$ 1,760	\$ 1,475	\$ 1,653
90%	\$ 2,000	\$ 1,500	\$ 1,582	\$ 2,539	\$ 2,600	\$ 2,075	\$ 2,405
SUBSIDY ELECTRIC NON HEATING ANALYSIS							
FPL 50 - NONHEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 1,125	\$ 955	\$ 1,071	\$ 1,425	\$ 1,725	\$ 1,544	\$ 1,565
80%	\$ 1,490	\$ 1,279	\$ 1,448	\$ 1,918	\$ 2,260	\$ 2,054	\$ 2,077
90%	\$ 2,100	\$ 1,850	\$ 2,126	\$ 2,753	\$ 3,110	\$ 2,940	\$ 2,934
FPL 100 - NONHEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 920	\$ 832	\$ 834	\$ 1,315	\$ 1,607	\$ 2,125	\$ 1,682
80%	\$ 1,265	\$ 1,128	\$ 1,120	\$ 1,808	\$ 2,185	\$ 2,610	\$ 2,201
90%	\$ 1,850	\$ 1,595	\$ 1,637	\$ 2,658	\$ 3,140	\$ 3,420	\$ 3,073
FPL 150 - NONHEATING	2019	2020	2021	2022	2023	2024	2022/2023/2024 AVERAGE
70%	\$ 680	\$ 623	\$ 654	\$ 844	\$ 1,200	\$ 1,167	\$ 1,070
80%	\$ 910	\$ 840	\$ 913	\$ 1,227	\$ 1,646	\$ 1,605	\$ 1,493
90%	\$ 1,375	\$ 1,253	\$ 1,338	\$ 1,980	\$ 2,450	\$ 2,330	\$ 2,253

- Please see Table 3 for information the potential impact of CAP credit limits on monthly bills for UGI Electric CAP and non-CAP customers.

Table 3

FPL/ACCOUNT TYPE	MAX CAP CREDIT AT 84% SUBSIDY RATE	2024 TOTAL CAP CUSTOMER AMOUNT IN EXCESS OF MAX CAP CREDIT	NUMBER OF CAP CUSTOMERS EXCEEDING MAX CAP CREDIT	AVERAGE COST PER CAP CUSTOMER EXCEEDING MAX CAP CREDIT
FPL 50 - HEATING	\$ 2,873	\$ 156,529	128	\$ 1,223
FPL 100 - HEATING	\$ 2,381	\$ 97,005	74	\$ 1,311
FPL 150 - HEATING	\$ 1,969	\$ 28,081	32	\$ 878
TOTAL ALL HEATING FPL		\$ 281,615	234	\$ 3,411
FPL 50 - NONHEATING	\$ 2,437	\$ 248,631	197	\$ 1,262
FPL 100 - NON HEATING	\$ 2,567	\$ 178,490	145	\$ 1,231
FPL 150 - NONHEATING	\$ 1,812	\$ 139,090	138	\$ 1,008
TOTAL ALL NON HEATING FPL		\$ 566,211	480	\$ 3,501
OVERALL ALL HEATING AND NON HEATING FPL TOTAL CAP CUSTOMER IMPACT		\$ 847,826	714	\$ 1,187
USP RIDER CUSTOMER IMPACT				
CREDIT FROM MAX CAP CREDIT		\$ (847,826)	50,256	\$ (16.87)
BAD DEBT EXPENSE ESTIMATED IMPACT		\$ 593,478	50,256	\$ 11.81
TOTAL		\$ (254,348)	50,256	\$ (5.06)

p. High Usage Threshold:

- *Clarification Required:* UGI is directed to provide an explanation for reducing its high usage criteria.

Response: As referenced on page 21 of the proposed USECP, these thresholds were determined by identifying the top 5% of the highest usage customers and then utilizing that data to establish the respective high usage criteria for Gas and Electric customers.

- *Clarification Required:* Additionally, UGI is directed to report:
 - 1) The number of CAP customers for each company found to have exceeded the high usage threshold from 2020 through 2023.
 - 2) The number of CAP customers for each company who exceeded the high usage criteria from 2020 through 2023 who were referred to LIURP.
 - 3) The number of these LIURP referrals from 2020 through 2023 that resulted in successfully reducing usage below the high usage threshold.
 - 4) The number of existing CAP customers that currently exceed UGI's current high usage thresholds and the number of existing CAP customers who would exceed the proposed high usage thresholds.

(Order at 37.)

Response: Please see the responses below:

- 1) Below are the high usage customer counts for UGI Gas:

2021 – 644
 2022 – 502
 2023 – 513
 2024 – 592

Below are the high usage customer counts for UGI Electric:

2021 – 62

2022 – 66
2023 – 83
2024 – 102

The Company began separately tracking electric high usage customers in 2025. Prior to that, the Company tracked and reported cumulative customer usage for all LIURP customers after audit measures were implemented.

- 2) As stated above, the Company did not previously track this information. In 2025 there were 99 electric and 607 gas CAP customers who exceeded high usage and all of them were referred to LIURP.
- 3) See the responses to subparts 1 and 2 above.
- 4) As of August 2025, the number of existing CAP customers that currently exceed UGI's current high usage thresholds is 212 electric CAP customers and 433 gas CAP customers. The number of existing CAP customers who would exceed proposed high usage thresholds is 261 electric CAP customers and 1,890 gas CAP customers.

q. CAP Assistance and Continuation of Operations:

- *Clarification Required:* UGI is directed to clarify whether it has developed procedures to ensure CAP and CAP eligible customers can receive assistance by contacting either UGI or its CAP agency and, if necessary, be transferred to the correct representative who can best address their situation. (Order at 38.)

Response: Yes, the Company has developed procedures to ensure CAP customers can receive assistance by contacting UGI or agencies.

- *Clarification Required:* Additionally, UGI is directed to clarify its contingency procedures, if any, on how it would continue CAP operations in the event of an emergency that makes the CAP agency unavailable, such as a cyberattack or an abrupt end to a contract. (Order at 38.)

Response: In the event of an emergency, such as a cyber-attack, the Company would process CAP applications in-house. Additionally, the Company's contracts with CAP agencies state that agencies must give the Company 20 days' notice to terminate a contract, therefore the Company would initiate steps to contract with another CBO.

r. Customer Education and Outreach Plan (CEOP)

- No clarification was requested from the Commission for this section.

s. CEOP Initiatives:

- *Clarification Required:* UGI is directed to provide the following clarifications and information related to its CEOP initiatives:
 - Indicate which CEOP initiatives are new (i.e., implemented in 2021 or later) and which initiatives represent existing practices to help its most vulnerable customers (e.g., at or below 50% of the FPIG, LEP, etc.).

- Explain how it educates customers on how to determine their own “household energy burden” to help encourage interest and participation in CAP and stimulate actions for energy conservation in the household.
- Explain if targeted education and outreach to landlords is tracked and, if so, whether it has resulted in increased participation of rental properties in LIURP.

(Order at 40.)

Response: Please see the information below:

- The Company’s CEOP initiatives are primarily all new, but below are the exhibits attached to the USECP that are not new (older than 2021):
 - Exhibit 2 - Links to Web Pages
 - Exhibit 3 - Press Releases
 - Exhibit 4 - Welcome Packet
 - Exhibit 7 - Ebill
 - Exhibit 8 - Social Media posts
 - Exhibit 15 - CAP Recertification Letter
- The Company focuses on the benefits of CAP, such as arrearage forgiveness, bill credit forgiveness, and a lower monthly payment in order to encourage awareness of CAP. However, the Company does not specifically focus on energy burden messaging when marketing to potential CAP participants.
- The Company is not providing targeted education and outreach to landlords about the benefits of LIURP.

t. Consumer Education Materials:

- *Clarification Required:* UGI is directed to update the LIURP income-eligibility criteria in Appendix H, Exhibit 9, to reflect the current LIURP income criteria and revise any other outreach and education material in Appendix H that are inconsistent with program policies and procedures in its Proposed 2026 USECP. (Order at 41.)

Response: Please see Exhibit 4 for an updated copy of the insert which includes current income criteria and is distributed with the Universal Service Program (USP) brochure. The Company will provide a copy of the updated USP brochure once it has been revised to include content required pending approval of the Company’s 2025 Gas Base Rate Case.

- *Clarification Required:* UGI is directed to file a copy of the revised documents with its Supplemental Information. (Order at 41.)
Response: Please see response above.

2. LIURP

a. LIURP Eligibility Criteria:

- *Clarification Required:* UGI is directed to explain the basis of omitting the provision for eligible customers with gross household income at or below 150% of the FPIG to qualify for LIURP and clarify if eligible customers within this income threshold can still qualify for LIURP. (Order at 44.)

Response: The Company inadvertently excluded the provision that customers at or below 150% FPIG are eligible for LIURP. The Company will update this language as part of the Company's USECP Compliance filing.

- *Clarification Required:* Further, although we recognize that LIURP regulations do not require public utilities to serve "special needs customers" with household income between 151% and 200% of the FPIG, UGI is directed to clarify if it serves these customers. (Order at 44.)

Response: For UGI Gas, the Company offers LIURP services to all customers in the 151 to 200% FPIG range. For UGI Electric, the Company offers LIURP services, up to 20% of its Electric LIURP budget, to all customers (including special needs) in the 151 to 200% FPIG range. The Company will add a definition of "special needs customer" in the Compliance Plan filing.

- *Clarification Required:* If such customers are eligible for LIURP, UGI is directed to clarify its definition of the term "special needs customer" regarding LIURP eligibility and explain its guidelines for using up to 20% of its LIURP budget on providing services to "special needs customers" with household income between 151% and 200% of the FPIG. (Order at 44-45.)

Response: As referenced in the immediately prior response, the Company does not differentiate between special needs and non-special needs customers when utilizing 20% of its Electric LIURP budget for customers in the 151 to 200% FPIG range. The Company will comply with any final regulations lawfully adopted and promulgated pursuant to the pending rulemaking proceeding at Docket No. L-2016-2557886.

b. LIURP Eligibility – Exceptions

- *Clarification Required:* UGI is directed to describe the circumstances under which a customer could qualify for exceptions to its LIURP eligibility guidelines. (Order at 45.)

Response: The Company provides exceptions to customers who are not exceeding the usage threshold, and do not qualify for the heating system repair program, for LIURP if they have extenuating circumstances, such as elderly or young household members or household members who are ill.

- *Clarification Required:* UGI is also directed to explain what specific circumstances or situations, if any, qualify a customer for an exception to its current seven-year re-weatherization time limit. (Order at 45.)

Response: The Company will provide an exception to its current seven-year weatherization timeframe based on the circumstances involved (e.g., to address customer satisfaction or other issues with weatherization measures installed identified within 12 months of the weatherization date).

c. Energy Conservation Kits

- *Clarification Required:* UGI is directed to explain the basis for the omission of this provision in its Proposed 2026 USECP and clarify if it still provides electric non-heating LIURP participants with Energy Conservation Kits. (Order at 46.)
- *Response:* The Company omitted the conservation kits because the CBOs experienced a lack of customer demand. Therefore, the Company changed its methodology and began sending out conservation education packets, which are provided to customer upon request.

d. Energy Conservation Education

- *Clarification Required:* UGI is directed to explain what a home and telephonic energy education session entails and how it communicates energy education content and requirements to agency providers, including LIURP agency contractors. (Order at 46.)

Response: The Company's contracted LIURP agencies conduct the audit and provide education to UGI Electric non-heating customers prior to weatherization, during the audit, based on the findings and measures to be installed. If no measures can be installed, the agency provides energy efficiency tips.

e. Minimum Usage Threshold for Electric Baseload

- *Clarification Required:* UGI is directed to explain the reason for creating a minimum usage threshold for electric baseload (non-heating) customers and the methodology used to establish the 6,000 kWh minimum usage threshold criteria. (Order at 47.)

Response: The minimum kWh usage is based on an analysis of electric baseload low-income customers' usage. This minimum has been in place for many years but was not defined in the 2020 - 2025 USECP.

f. Incidental Repairs, Health and Safety Measures, and Deferrals

- *Clarification Required:* UGI is directed to explain their parameters and allowance thresholds for performing incidental repairs. (Order at 48.)

Response: The Company allows the contractor/agencies to spend up to \$2,000 for homeowners and \$1,250 for renters on incidental repairs which are necessary to facilitate or permit the installation of LIURP weatherization measures.

- *Clarification Required:* UGI is directed to indicate whether it performs routine health and safety measures and, if so, to explain its parameters and allowance thresholds for addressing those issues. (Order at 48-49.)

Response: The Company addresses health and safety measures on a case-by-case basis to adhere to the allowance mentioned above.

- *Clarification Required:* Further, UGI is directed to identify its process for disqualifying dwellings from LIURP, including how customers are notified of the

reasons for disqualification; the number of dwellings disqualified per year from 2022 to 2024 and the reasons for disqualification; what agencies or programs it refers deferred dwellings to; and how long it maintains a list of deferred dwellings. (Order at 49.)

Response: As stated in the Plan, dwellings can be disqualified for items such as hoarding, asbestos, rodent infestation, mold, flooding, or other safety hazards. Typically, these hazards are identified on the initial audit that occurs at the customer's premise, and then the hazards are documented and explained to the customer in order to be resolved prior to LIURP measures being performed. The Company's LIURP contractors do not generally disqualify jobs. Instead, in many cases, jobs are deferred to allow the customer to remediate the issue(s) and then pursue LIURP at a later date.

The number of dwellings disqualified/deferred per year from 2022 to 2024 is as follows:

2022 – UGI Gas = 160; UGI Electric = 14
2023 – UGI Gas = 146; UGI Electric = 28
2024 – UGI Gas = 276; UGI Electric = 17

g. Post-Installation Inspection

- *Clarification Required:* UGI is directed to outline its LIURP quality control guidelines, including the methodology it uses to select a percentage of completed LIURP jobs to receive a post-installation inspection. (Order at 50.)

Response: The Company has a third-party inspector that performs inspections on behalf of the Company. The Company has a goal to inspect all LIURP jobs done through October of each year, which was approximately 71% of total jobs completed in calendar year 2024. Inspections stop in October so the Company can close out the year and avoid program year crossover.

Standard inspection protocols include determining if the measures installed during weatherization were:

- Appropriate for the situation following Building Science principles
- Achieving energy saving
- Solving a health and safety issue
- Installed correctly following BPI protocol, Standard Work Specification etc.
- Interviewing the customer concerning satisfaction with the audit and installation
- Identifying any customer concerns

In addition, the inspector ensures there are no health and safety issues that need to be remediated based on the installed measures. Any item(s) noted on the inspection report that need remediation would be noted by the inspector in the Company's Customer Outreach System ("COS").

The inspecting agency that is utilized by the Company also performs inspections for other utility's LIURP. The inspecting agency auditor completes fields in COS and answers the following questions:

- Overall quality of work
 - Were all measures listed on the invoice installed at the property? Yes or No
 - Please rate the overall quality of workmanship – Excellent, Acceptable, Not acceptable
 - Did the agency excel in a particular area of weatherization? – workmanship, customer satisfaction, other
- Energy Savings Measures
 - Review list of measures and indicate if installation of each item is a pass or fail
 - Were the correct measures performed to achieve the greatest energy savings? Yes or No
- Customer Satisfaction
 - Was the customer satisfied with the work complete in the home? Yes or No
 - Was the customer included in the auditing process and provided energy education? Yes or No
- Additional inspector comments the inspector may have concerning the property (open ended answer)
- *Clarification Required:* UGI is directed to explain what actions, if any, are taken if an installed program measure is not operating efficiently and/or when a LIURP recipient's energy usage increases after program measures are installed, including its warranty for covering workmanship. (Order at 50.)

Response: If an installed program measure is not operating efficiently within a year of installation, the agency is instructed to return to the customer's home to remediate measures or complete work corrections. If a recipient's energy usage increases after program measures are installed, the Company investigates on a case-by-case basis to determine the reason for negative savings. This includes:

- Company provides CBOs with a list of customers with negative savings
- CBOs reach out to the customers to obtain reason for increased energy usage
- If determined the increased energy usage is caused by issues relating to workmanship or installed measures within a year of installation, then the agency would remediate the issue.
- If determined the increased energy usage is related to actions or additional occupants within the premise, then no action is needed.

- *Clarification Required:* Further, UGI is directed to explain the process for handling complaints from customers when they have an issue with a LIURP contractor's work and/or service. (Order at 50.)

Response: If a customer complains about a LIURP contractor, the Company will send out a different LIURP contractor to remediate the work.

h. Landlord and Customer Consent

- *Clarification Required:* UGI is directed to clarify the method by which it documents landlord permission or refusal of LIURP services and provide a copy

of the letter or other communication used to request landlord consent. (Order at 51.)

Response: LIURP agencies are responsible for obtaining and storing (4 years) the signed landlord consent letters. Please see Exhibit 5 for a copy of the landlord consent letter. If the landlord does not consent to LIURP services, there is no physical document indicating the denial. The Company is only receiving completed forms acknowledging the consent. However, the agency would note the COS to reject the job.

- *Clarification Required:* If landlord consent is accepted in a method other than in writing, UGI is directed to describe all ways consent is obtained and documented. UGI is also directed to clarify how customer consent for LIURP services is obtained, including customer consent to share their information with LIURP agencies/contractors, and provide a copy of any consent form. (Order at 51.)

Response: The Company does not accept any other method of landlord consent other than in writing. When a customer is applying for LIURP services, they sign an eligibility affidavit waiver with the application. Please see Exhibit 6 for a copy of the waiver.

- *Clarification Required:* Further, UGI is directed to identify what program measures and/or referrals, if any, are provided to a renter if the landlord refuses to give consent to install comprehensive program measures. (Order at 51.)

Response: There are no referrals or measures provided to a renter if a landlord refuses to give consent.

i. Contractor Training and Certification Requirements

- *Clarification Required:* UGI is directed to provide details of its LIURP contractor training and certification requirements. (Order at 52.)

Response: The Company periodically hosts annual hands-on contractor training in conjunction with Penn College. The Company provides training for new employees and/or agencies of its contracted LIURP agencies on an as-needed basis.

Regarding the Company's certification requirements, the Company's Master Service Agreement between UGI and its contractors states "Contractor represents and warrants that Contractor is duly authorized to enter into the Contract Documents and to perform its obligations hereunder; that Contractor's employees, agents and contractors performing the Services are fully experienced and properly qualified to perform the Services; and that the Services will be performed with Contractor's best efforts and skills."

j. Inter-Utility Coordination – Exceptions

- *Clarification Required:* UGI is directed to clarify if it grants exceptions to the LIURP eligibility criteria for LIURP jobs coordinated with other public utility LIURPs and other weatherization programs. (Order at 53.)

Response: The Company does not grant exceptions to the LIURP eligibility criteria simply because a customer is participating in LIURP with another utility or state weatherization program.

k. Rehabilitation Program

- *Clarification Required:* UGI is directed to explain the basis for omitting the 2020 USECP provisions addressing eligibility and reporting requirements from the Proposed 2026 USECP and confirm if those provisions are still applicable. (Order at 56.)

Response: The Company inadvertently omitted footnote 62 and 63 that was in the 2020-2025 USECP. To clarify, both provisions are still applicable to the 2026-2030 USECP and will be updated as part of the Company's USECP Compliance filing. The Company inadvertently omitted language about reporting, specifically "In the 2025-2030 UGI will continue to track and report the program results and details separately." The Company will update this language as part of the Company's USECP Compliance filing.

- *Clarification Required:* UGI is also directed to clarify if the Rehabilitation Program is still available to homeowners and renters. (Order at 56.)

Response: The Rehabilitation Program is available to both homeowners and renters.

- *Clarification Required:* Further, UGI is directed to provide Rehabilitation Program annual data for each of the UGI companies from 2022 through 2024. This annual data should include:
 - The number of jobs completed.
 - Number of homeowners served.
 - Number of renters served.
 - Types of program measures installed.
 - Total program costs, separated into the total amount spent on the jobs and the amount spent on administration costs.
 - Average cost per job.
 - Estimated average annual energy savings per job.

(Order at 56.)

Response: The Company did not complete any rehabilitation jobs during the 2022–2024-time frame.

l. April 2025 Petition - Regulatory Waivers (Docket No. P-2025-305438)]

- *Clarification Required:* The Commission will address the UGI's April 2025 Petition as part of the review of its Proposed 2026 USECP. Accordingly, the Commission requests stakeholder comments on UGI's April 2025 Petition requesting a limited waiver of LIURP regulations 52 Pa. Code §§ 58.10(a)(1) and 58.11(a) for the duration of its Proposed 2026 USECP. (Order at 57.)

Response: UGI will respond to stakeholder comments as part of this proceeding.

3. CARES

a. CARES Program Funding

- *Clarification Required:* UGI is directed to clarify how its CARES program is funded and costs recovered, if applicable. (Order at 59.)

Response: The UGI CARES program is not part of the Universal Service Programs rider. The UGI CARES program is funded through the Company's operating expense budgets.

b. LIHEAP Outreach

- *Clarification Required:* UGI is directed to explain whether it would consider expanding its LIHEAP outreach to include additional initiatives such as a general calling campaign.

Response: The Company has continued to expand efforts to alert UGI's customers of all the Company's low-income programs, including LIHEAP. In addition to email, social media and website messaging, the Company will be utilizing its dialer to inform CAP recipients that have not received LIHEAP that the program may be a benefit and provide information on how to apply. The Company is also attending specialized events to educate customers on programs that may be able to assist them with their energy bills.

- *Clarification Required:* Additionally, UGI is directed to explain what factors may have resulted in the increase in CAP enrollees participating in LIHEAP, as well as how it plans to increase LIHEAP participation with a reduced LIHEAP outreach staff.

Response: The Company has cross-trained personnel and implemented measures to accommodate LIHEAP calls from County Assistance Offices during LIHEAP season through a specialized phone line (800-UGI-WARM) that is staffed accordingly to handle the volume of calls.

The Company has a "confirmed low-income email campaign" to customers not enrolled in the Company's programs that references LIHEAP in two specific emails and directs customers to apply for LIHEAP on the COMPASS website directly. Each email has a way for customers to contact assistance@ugi.com to request additional information. Please see Exhibit 7 for a copy of the email campaign.

The Company has a standard response to email inquiries during LIHEAP season that includes a link to COMPASS so customers can apply to LIHEAP directly from COMPASS. The Company also provides customers with an option to request a physical LIHEAP application that gets mailed to them.

4. Operation Share Energy Fund

a. Eligibility – CAP Customers

- *Clarification Required:* UGI is directed to clarify whether and under what circumstances, if applicable, a CAP customer would be eligible to receive an Operation Share grant. (Order at 62.)

Response: A CAP customer would be eligible to receive an Operation Share grant as long as the customer meets program guidelines.

b. Operation Share Donations

- *Clarification Required:* UGI is directed to explain the reasons why it anticipates a decrease in UGI Gas and Electric cash donations for Operation Share and what steps it is taking to solicit more donations from customers and employees. (Order at 64.)

Response: UGI anticipates a decrease in public cash donations based on historical trending. The Company saw a 63% decrease YOY from 2022 to 2024. UGI has boosted marketing efforts to solicit cash donations through various efforts including:

- Encouraging the public to donate via PayPal.
- Utilizing an annual Christmas bill insert.
- Soliciting employees annually with a direct giving campaign and additional efforts like a t-shirt sale.

The Company's 2025 Gas Base Rate Case settlement (paragraph 62(a)) included increasing the Company's Operation Share contribution by \$500,000 (54%) for a total of \$1,084,500 in annual contribution for UGI Gas.

c. Exceptions to Maximum Grant Amounts

- *Clarification Required:* UGI is directed to outline the circumstances under which a customer would qualify for an exception to the maximum grant amount for Operation Share. (Order at 64.)

Response: The Company does not provide exceptions to maximum grant amounts.

d. Regional Operation Share Budget Reallocation

- *Clarification Required:* UGI is directed to detail the criteria, data, and methodologies it employs to assess the need for reallocation of up to 25% of the regional Operation Share budget and determine the amount of funding to be reallocated. (Order at 65.)

Response: The Company proposed a reallocation maximum of 25% because historical data indicated that funding was underutilized within certain regions given the current provision to not exceed the 5% reallocation limit. Furthermore, if the 2025 Gas Base Rate Case Settlement (paragraph 62(b)) is approved, the Company will be permitted to increase its current 5% reallocation limit to 50%.

B. Projected Needs Assessment

a. Estimated and Confirmed Low-Income Customer Count

- *Clarification Required:* UGI is directed to explain the reason for the reduction in estimated and confirmed low-income customer counts for UGI Gas as compared to the data previously reported for 2023. (Order at 66.)

Response: The identified low-income customer counts (40,879) shown on Table B-1 in the 2026-2030 USECP filing included the Company's income verified customers who were eligible for enrollment in a Universal Service Program.

The estimated low-income count (166,336) in the Universal Service Programs and Collections Performance 2023 Report was inadvertently miscalculated due to the incorrect inclusion of non-residential customer counts. However, the 2026-2030 USECP filing correctly included only residential customer counts (147,552) when calculating estimated low-income customers.

The number reported in the Universal Service Programs and Collections Performance 2023 Report was 89,923, which included Confirmed Low Income customers counts that were inadvertently including customers up to 250% FPL. The Company is in the process of correcting the reporting to only include customers up to 150% FPL and the Company has communicated this effort to the PUC.

- *Clarification Required:* UGI Gas is also directed to update its count of estimated low-income customers based on 2019-2023 Census data. (Order at 66.)

Response: The updated count of estimated low-income gas customers based on 2019-2023 census data is 143,404 customers at or below 150% FPL.

- *Clarification Required:* UGI shall also update its confirmed low-income customer count, if needed, and identify separately the number of estimated and confirmed customers with incomes between 151% to 200% of the FPIG. (Order at 66.)

Response: The Company is not able to segment customer level data between 151 to 200% FPIG. The estimated low-income customer count based on the 2019-2023 Census data is 58,880.

b. Customers in Need of LIURP

- *Clarification Required:* UGI is directed to identify the eligibility factors used to calculate the number of customers potentially eligible for LIURP and provide customer numbers for each factor, broken down by FPIG level (i.e., 0-150% and 151% to 200%). (Order at 68.)

Response: The Company is unable to break down customers in the FPIG levels of 0-150% and 151% to 200%. The Company evaluated customers whose usage exceeded thresholds and were income verified. The Company follows the factors under 52 Pa. Code 58.4(c)(1)-(4).

- *Clarification Required:* Further, UGI is directed to explain how it ensures that the customers within the 0%-150% tier of the FPIG are prioritized for LIURP. (Order at 68.)

Response: LIURP agencies prioritize work and are instructed that eligible customers at or below the 150% FPL should be prioritized, as only 20% of the overall LIURP budget can be used for weatherization efforts for customers between 151 - 200% FPL.

c. Projected Needs Assessment for UGI Electric

- *Clarification Required:* UGI is directed to provide a projected needs assessment for UGI Electric. This needs assessment should include all updated or additional information requested for UGI Gas’s needs assessment in issues a and b above. (Order at 69.)

Response: The identified low-income customer counts (6,251) shown in the table below includes the Company’s income verified customers who were eligible for enrollment in a Universal Service Program.

UGI Electric Needs Assessment	Electric
1. Number of Identified Low-Income Customers	6,251
2. Estimate of Number of Low-Income Customers	16,469
3. Number of Identified Payment-Troubled, Low-Income Customers	253
4a. Number of Customers in Need of LIURP Services - Heating	676
4b. Number of Customers in Need of LIURP Services - Baseload	2,329
4c. Total Number of Customers in Need of LIURP Services	3,005
5a. Cost of Serving the Number of Customers in Need of LIURP Services - Heating	\$4,298,557
5b. Cost of Serving the Number of Customers in Need of LIURP Services - Baseload	\$4,860,078
5c. Total Cost of Serving the Number of Customers in Need of LIURP Services	\$9,158,635
6. Enrollment Size of CAP to Serve all Eligible Customers	6,251

C. Projected Enrollment Levels

- The Commission is not currently requiring any clarifications to this aspect of the Proposed 2026 USECP.

D. Program Budgets

LIURP Budget

- *Clarification Required:* UGI is directed to clarify:
 - If the projected LIURP budgets will increase annually by 3% for each year when no residential rate case increases are implemented.
 - How reallocated LIURP funds unspent at the end of a program year will be used.
 - If the projected LIURP budgets reflected in Table 14 include or exclude the 10% designated for the Rehabilitation Program.

UGI is also directed to provide a projected annual budget for the Rehabilitation Program for 2026 through 2030. (Order at 73.)

Response: UGI responds to each of the bullets as follows:

- Yes.
- Under the 2025 Gas Base Rate Settlement (paragraph 60(d)), if approved by the commission, “UGI Gas shall make its best efforts to spend the remaining unspent budget from the prior year within the first six months of the following year. For any remaining carryover budget from the previous year not spent after the six months, the Company agrees to comply with any final regulations lawfully adopted and promulgated pursuant to the pending rulemaking proceeding at Docket No. L- 2016-2557886.”
- Yes, it is included.

In addition, the Company will reserve up to 10% of the funds identified in Table A-3 and will re-release funds if unused.



UGI Utilities, Inc.
Post Office Box 13009
Reading, PA 19612-3009

August 4, 2025

«Customer_Name»
«Mail_Add_House__and_Street_Add»
«Mail_Add_City», «Mail_Add_State» «Mail_Add_Zip_Code»

Dear «Customer_Name»,

Our records indicate you have received a LIHEAP grant in the 2024-2025 LIHEAP season. Based on this information, account number «Contract_Account_ID» will be automatically enrolled in our Customer Assistance Program (“CAP”), effective with your next bill. If you do not reply before May 27, 2025 your next bill will show your monthly CAP Amount. That amount will be \$ **«Suggested CAP Amount»**. Enrollment into CAP* assists you in managing your monthly energy bills, is free and has no impact on your credit score.

If we do not have income or household member details for your household, we will enroll you in the “Average Bill” rate. **If you provide additional income and household member information to the Commission on Economic Opportunity at 165 Amber Lane Wilkes Barre PA 18703 you may qualify for a lower monthly income-based payment.**

We have included the Customer Assistance Program Rules to address any questions you may have and what is expected of you after enrollment in CAP takes effect.

If you do not want to take advantage of CAP, or if you feel you received this offer in error, please call (800) UGI WARM and select prompt 1 or email assistance@ugi.com and provide this statement: “I do not wish to be auto enrolled in the Customer Assistance Program (CAP) for account # «Contract_Account_ID»”.

Please note you must pay the CAP-Enrolled Monthly Payment on time, each month, in order to remain enrolled in CAP. If your account remains in good standing (paid on time) each month, any past due debt you had before enrolling in CAP will be forgiven in equal credits over 36 months.

If you fall behind on your CAP payments, you will not be eligible for a payment arrangement from the Public Utility Commission for missed CAP payments.

Thank you,

UGI Utilities

**Accounts that purchase their natural gas from another supplier do not qualify for CAP.*



August 8, 2025

«Full_Name»
«Full_Mailing_Street»
«Full_City_State_Zip»

Hello,

Thank you for sharing the income information on your recent LIHEAP application with UGI. Based on this information, you qualify for enrollment in the UGI Customer Assistance Program (CAP) for account «Customer_Account». Enrollment in the CAP Program will assist you in managing your monthly energy bill, is free and has no impact on your credit score.

If you are interested in enrolling in CAP you just need to do one of the following:

- Email assistance@ugi.com and include this information: “Yes, I want to enroll account number «Customer_Account» into the Customer Assistance Program”.
- Sign the back of this letter and check the “Yes! I want to enroll...” box. Return the letter to us using the enclosed address envelope. (You will need to put a stamp on prior to mailing.)

Enrolling in CAP means you have a set monthly payment based on a percentage of income or the average bill at your property (whichever is lower). The percentage of income is between 4% and 9% for a heating customer. Additional benefits include bill forgiveness and forgiveness of past due balances.

If you have recently enrolled into CAP, you can disregard this letter.

Thank you for being a customer of UGI.

UGI Utilities

- Yes! I want to enroll account number «Contract_Account_ID» in the Customer Assistance Program (CAP)

Name of Account Holder: _____

Signature of Account Holder: _____

Date of Signature: _____

- By checking this box, I certify I am authorized to make decisions about the account number listed in this letter.

Please note you must pay the CAP-Enrolled Monthly Payment on time, each month, and provide updated income annually in order to remain enrolled in the program. If you have an alternate supplier you will need to return to default service in order to enroll in the Customer Assistance Program (CAP).

Return this letter in the enclosed self-addressed envelope. You will need to attach a stamp prior to mailing.

Hello,

Thank you for sharing the income information on your recent LIHEAP application with UGI. Based on this information, you qualify for enrollment in the UGI Customer Assistance Program (CAP) for account «Contract_Account_ID». Enrollment in the CAP Program will assist you in managing your monthly energy bill, is free and has no impact on your credit score.

Opt In Now

If you are interested in enrolling in CAP reply to this email and include this information: “Yes, I want to enroll account number «Contract_Account_ID» into the Customer Assistance Program”.

Benefits of CAP

[Enrolling in CAP](#) means you have a set monthly payment based on a percentage of income or the average bill at your property (whichever is lower). The percentage of income is between 4% and 9% for a heating customer. Additional benefits include bill forgiveness and forgiveness of past due balances.

If you have recently enrolled in CAP, you can disregard this email. If you have an alternate supplier you will need to return to default service in order to enroll in the Customer Assistance Program (CAP).

Thank you for being a customer of UGI.

UGI Utilities



UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
(800) 276-2722

Michael Swerling
Senior Counsel
UGI Legal Department

[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED],

UGI Utilities, Inc. (UGI) provides customers the opportunity to participate in a variety of bill payment assistance programs. You are currently enrolled in UGI's Customer Assistance Program ("CAP"), which provides you the benefit of a fixed monthly bill, with forgiveness of charges above your bill, as well as debt forgiveness if monthly CAP payments are made on time.

During the annual CAP recertification process in November 2023, you met with UGI's Community Based Organization ([REDACTED]) to develop high usage controls for your residence. UGI defines high usage as annual usage that exceeds 34,465 kWh. Your annual usage is normally between 67,000 and 68,000 kWh. During your meeting with CEO, a high usage questionnaire was completed, and an action plan was developed to lower usage. However, your UGI Electric account continues to have usage substantially higher than 34,465 kWh per year.

As a result of your high annual energy usage, on April 2, 2024, you were contacted by [REDACTED], on behalf of UGI, to enroll you in our Low-Income Usage Reduction Program ("LIURP"). LIURP provides **free** energy efficiency education and weatherization services including enhanced insulation and air sealing, smart thermostats, and other use reduction options. The goal of this program is to increase the efficiency and comfort of your home, while also reducing energy usage.

It is UGI's understanding, based on feedback you provided via emails dated April 02, 2024, and April 03, 2024, that you have declined the offer to participate in LIURP. One condition of continued participation in UGI's CAP is that a customer must participate in LIURP if the Company has identified that they have higher than normal electric use and are otherwise eligible for LIURP. UGI reserves the right to remove any customer from the CAP if they decline to participate in Company offered usage reduction programs.

If you are removed from CAP, you will no longer be entitled to a fixed monthly bill of \$46.00 and you will be responsible for the full amount of your bill based on your energy usage. Based on your usage and without CAP, your average monthly bill over the past year would



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Michael Swerling
Senior Counsel
UGI Legal Department

be \$897.00 per month. In addition, removal from CAP would also make you responsible for paying all outstanding balances immediately.

If you do not contact UGI via email at assistance@ugi.com or by calling, (800)-276-2722 to indicate your willingness to participate in LIURP within 30 days of receiving this letter, UGI will begin the process of removing you from our Customer Assistance Program.

Sincerely,

Michael Swerling



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009

July 11, 2024



Customer Number: [REDACTED]

Dear [REDACTED],

This letter is to inform you that your UGI account has been removed from the Customer Assistance Program (CAP). You have been removed from CAP for the following reason:

- Removed - Failure to apply for LIURP

If you have questions regarding your removal, please call UGI's Customer Information Center at (800) 276-2722.

Sincerely,

UGI Customer Outreach Department



UNIVERSAL SERVICE PROGRAMS

www.UGI.com/helpinfo

Low Income Assistance Programs
Low Income Home Energy Assistance Program (LIHEAP) A grant program run by the state of PA. Typically the program is open November through April of each heating season. Eligible customers must be at or below 150% FPL.
UGI Customer Assistance Program (CAP) provides an even monthly payment based on the lower of a percent of income or average bill. You would also earn forgiveness on any past due balance owed to UGI with on time monthly payments. Eligible customers must be at or below 150% FPL.
Operation Share is a grant program through UGI to help UGI customers that are past due and experiencing a hardship. Eligible customers must be at or below 250% FPL.
UGI Low Income Usage Reduction Program (LIURP) This is UGI's weatherization program. A professional contractor will install energy saving measures into your home to make your home more energy efficient at no cost to you. Eligible customers must be at or below 200% FPL.

Monthly Gross Household Income*			
Household Size	150% FPL	200% FPL	250% FPL
1	\$1,956	\$2,608	\$3,260
2	\$2,644	\$3,525	\$4,406
3	\$3,331	\$4,442	\$5,552
4	\$4,019	\$5,358	\$6,698
5	\$4,706	\$6,275	\$7,844
each add'l	\$688	\$917	\$1,146

* FPL changes at the beginning of each year.

How to get help:

Ask the agency that provided this information to you for an application for the program you're interested in. You can benefit from multiple programs.

- Contact UGI at (800) UGI WARM and speak with one of our helpful WARM representatives – they can review information and eligibility with you but in most cases, you must provide proof of income to your local Community Based Agency in order to enroll.
- Visit www.ugi.com/helpinfo to learn more about customer assistance programs, appliance rebates, and billing options.
- Call 211 to get connected with a resource specialist for free.
- Visit findhelp.org to find support in your zip code.

UGI is committed to helping customers who make a sincere effort to pay their bills. Our representatives can assist you by providing information on a variety of energy assistance programs, making referrals to local agencies, offering participation in fuel funds, or establishing payment arrangements. Call (800) UGI-WARM or (800) 844-9276 to learn more.



Spanish (ES-US)	UGI está comprometida a ayudar a los clientes que hacen un esfuerzo sincero para pagar sus facturas. Nuestros representantes pueden ayudarlo al proporcionar información sobre diversos programas de asistencia energética, haciendo derivaciones a agencias locales, ofreciendo participación en fondos de combustible o estableciendo acuerdos de pago. Hay intérpretes de servicios de idiomas disponibles para ayudar por teléfono. Llame al (800) UGI-WARM u (800) 844-9276 para obtener más información.
Ukrainian (UK-UA)	Компанія UGI прагне допомагати клієнтам, які докладають щирих зусиль для оплати рахунків. Наші представники можуть допомогти вам, надаючи інформацію про різноманітні програми енергетичної допомоги, надсилаючи рекомендації до місцевих агентств, пропонуючи участь у паливних фондах або приймаючи умови оплати. Для допомоги у спілкуванні телефоном доступні послуги перекладачів. Зателефонуйте (800) UGI-WARM або (800) 844-9276, щоб дізнатися більше.
Russian (RU-RU)	Компания UGI стремится помогать клиентам, которые прилагают искренние усилия для оплаты счетов. Наши представители могут помочь вам, предоставляя информацию о различных программах энергетической помощи, направляя рекомендации в местные агентства, предлагая участие в топливных фондах или принимая условия оплаты. Для помощи в общении по телефону доступны услуги переводчиков. Позвоните по телефону (800) UGI-WARM или (800) 844-9276, чтобы узнать больше.
Italian (IT-IT)	UGI si impegna ad aiutare i clienti che si sforzano sinceramente di pagare le proprie fatture. I nostri rappresentanti possono assistervi fornendo informazioni su una varietà di programmi di assistenza energetica, indirizzandovi alle agenzie locali, offrendo la partecipazione a fondi per il carburante o stabilendo accordi di pagamento. Gli interpreti del servizio linguistico sono disponibili per fornire assistenza telefonica. Chiamare (800) UGI-WARM o (800) 844-9276 per ulteriori informazioni.
Hindi (HI-IN)	UGI उन ग्राहकों की मदद करने के लिए प्रतिबद्ध है, जो अपने बिलों का भुगतान करने के लिए गंभीरता से प्रयास करते हैं। हमारे प्रतिनिधि विभिन्न ऊर्जा सहायता कार्यक्रमों के बारे में जानकारी प्रदान करेंगे, स्थानीय एजेंसियों को रेफरल बनाकर, ईंधन कोषों में भागीदारी की पेशकश करेंगे या भुगतान व्यवस्था स्थापित करके आपकी सहायता कर सकते हैं। फोन पर सहायता के लिए भाषा सेवा दुभाषिए उपलब्ध हैं। अधिक जानने के लिए (800) UGI-WARM या (800) 844-9276 पर कॉल करें।
French (FR-FR)	UGI s'engage à aider les clients qui font réellement de leur mieux pour payer leurs factures. Nos représentants peuvent vous aider en vous fournissant des informations sur divers programmes d'aide énergétique, en vous orientant vers des agences locales, en vous invitant à participer à des programmes de financement du carburant ou encore en vous proposant des modalités de paiement alternatives. Un service d'interpréariat par téléphone est mis à votre disposition. Appelez le (800) UGI-WARM ou le (800) 844-9276 pour en savoir plus.
German (DE-DE)	UGI ist bestrebt, Kunden zu helfen, die sich aufrichtig bemühen, ihre Rechnungen zu bezahlen. Unsere Vertreter können Ihnen helfen, indem sie Sie über eine Vielzahl von Energiehilfeprogrammen informieren, Sie an lokale Behörden verweisen, Ihnen die Teilnahme an Brennstofffonds anbieten oder Zahlungsvereinbarungen treffen. Dolmetscher des Sprachdienstes stehen Ihnen telefonisch zur Verfügung. Rufen Sie uns an unter (800) UGI-WARM oder (800) 844-9276, um mehr zu erfahren.
Arabic (AR)	تلتزم شركة UGI بمساعدة العملاء الذين يبذلون قصارى جهدهم لتسديد فواتيرهم. يستطيع ممثلونا مساعدتكم من خلال تقديم معلومات عن مجموعة متنوعة من برامج المساعدة في مجال الطاقة، أو إجراء إحالات إلى الوكالات المحلية، أو إتاحة المشاركة في صناديق الوقود، أو إنشاء ترتيبات للسداد. يتوفر مترجمون فوريون كجزء من الخدمات اللغوية لمساعدتكم عبر الهاتف. يُرجى الاتصال على الرقم (800) UGI-WARM أو الرقم (800) 844-9276 لمعرفة المزيد.
Japanese (JA-JP)	UGIでは、料金のお支払いに努力されているお客様をサポートするために、様々な取り組みをしております。弊社社員が、種々のエネルギー支援プログラムに関する情報の提供、最寄りの代理店への紹介、燃料基金への参加の案内、支払手続きの手配などを通じてお客様をサポートします。お電話では通訳サービスをご利用いただけます。詳しくは(800) UGI-WARM または(800) 844-9276 までお電話ください。
Simplified Chinese (ZH-CN)	UGI 致力于帮助真诚尽力支付账单的客户。我们的代表可以通过提供有关各种能源援助计划的信息、推荐给当地机构、参与燃料基金或建立付款安排来为您提供帮助。可通过电话获得语言服务口译服务。请致电 (800) UGI-WARM 或 (800) 844-9276 了解更多信息。



Landlord Name
Landlord Address Line 1
Landlord Address Line 2

Rental Address:

Customer Name
Customer Address Line 1
Customer Address Line 2

Hello,

The tenant at your property has expressed an interest in UGI Utilities' Low-Income Usage Reduction Program. The **Low-Income Usage Reduction Program (LIURP)** offers *free* energy conservation measures to high usage, low-income households to help make energy bills more affordable.

Possible energy saving measures may include replacement of the existing refrigerator with a new high efficiency model, hot water pipe insulation, caulking and weather-stripping, energy efficient lighting, and water flow restrictors.

Services are free of charge to eligible customers. The tenant must be a residential UGI Gas or Electric customer at the same address for at least 12 months to qualify for these services. **According to our records, your tenant meets the criteria to participate in our program.**

For us to proceed with the weatherization process, we require the following enclosed landlord release to be signed and returned to UGI Utilities. Please return the document in the enclosed postage envelope. If you have any questions concerning the weatherization program or the enclosed document, please contact a customer care representative at **1-800-UGI-WARM** (1-800-844-9276).

Thank You,
UGI Utilities, Inc.
Enc. Landlord Release Form



Low Income Usage Reduction Program

Landlord Release

The undersigned, as owner of certain real property located at

_____ (“The Premises”)

which Premises are currently occupied by _____ (“Tenant”), hereby authorizes UGI Utilities, Inc. (“UGI”), by its authorized contractor and subcontractor, to conduct an energy audit and implement weatherization measures at the Premises, and further agrees to release and indemnify UGI, its officers, directors, agents and employees, from and against any and all claims, suits, costs, fees (including reasonable attorney’s fees), liability or other loss, direct or indirect (collectively “Claims”), which Claims arise from or are in connection with the performance of the work hereby authorized. Accordingly, the undersigned agrees to look to the authorized contractor and subcontractor for satisfaction of any costs or damages incurred by the undersigned by reason of the work hereby authorized.

The undersigned further agrees not to (1) raise Tenant’s rent for not less than 12 months after the performance of the work hereby authorized or (2) require the Tenant to quit the Premises, solely by reason of the weatherization completed pursuant to this authorization, if the Tenant complies with on-going obligations and responsibilities owed the landlord.

Signed: _____

Dated: _____



Low Income Usage Reduction Program Eligibility Affidavit/Information Waiver

I _____ (print name) renting or owning certain real
property at Address _____

City _____ Zip _____ Phone # _____

am applying for the Low Income Usage Reduction Program ("the Program"), which includes installation of measures and performance of education services intended to reduce energy usage. I hereby certify that my gross household income does not exceed the annual/monthly income criteria based on the 2025 Federal Poverty Guidelines listed below:

Household Size	Gas & Electric Annual Income	Gas & Electric Monthly Income
1 person	\$31,300	\$2,608
2 persons	\$42,300	\$3,525
3 persons	\$53,300	\$4,442
4 persons	\$64,300	\$5,358
5 persons	\$75,300	\$6,275
6 persons	\$86,300	\$7,192
Each Additional Person	\$11,000	\$ 917

Eligible customers at or below the 150% FPL should be prioritized, as only 20% of the overall LIURP budget can be used for weatherization efforts for customers between 151 - 200% FPL.

I understand that UGI Utilities, Inc. ("UGI") or its contractor will perform a free energy audit at the above identified property before any grant approval is issued. Based on the audit results, UGI or its contractor will recommend the implementation of those conservation items with the quickest payback period until the allocated grant fund is exhausted. By signing this waiver I am allowing UGI to release to its contractor information about my account necessary to implement the Program.

I agree to indemnify UGI, its officers, directors, agents and employees, from and against any and all claims, suits, costs, fees (including reasonable attorney's fees), liability or other loss, direct or indirect (collectively "Claims"), which Claims arise from or are in connection with the performance of the work hereby authorized. Accordingly, I agree to look to the authorized contractor and subcontractor for satisfaction of any costs or damages incurred by me by the reason of the work hereby authorized.

I understand that the property must not be in a dilapidated or otherwise unsuitable condition to receive weatherization measures.

I understand that UGI or its contractor will provide (at no cost to me) an energy conservation education program, intended to further reduce my energy consumption. Some of the topics that will be covered are the importance of keeping fuel records, keeping windows closed during the heating season, keeping water heaters at a low to medium setting, not using a kitchen range as a heat source, and wearing warmer clothes during the heating season.

I attest that all statements and representations contained in this certificate are true and accurate.

Date _____ Signature _____

Email 1

Subject Line: Get Help Paying Your Bill
Preheader: UGI is here to help with multiple assistance programs.



Get Help Paying Your Bill in Three Simple Steps

Completing **one or all*** of these steps can help you keep up with your energy bills.



Step 1. Apply for a Grant

Low Income Home Energy Assistance Program (LIHEAP)
Available at or below 150% Federal Poverty Limit

LIHEAP helps families pay heating bills with a grant between the amount of \$200 - \$1,000. This money does not have to be paid back and gets sent directly to UGI to pay your bill.

Applications for this program are accepted every heating season between November and April; however, customers must reapply each year to confirm eligibility and receive the grant.

Operation Share Grant
Available at or below 250% Federal Poverty Limit

If you are struggling to pay your bill due to temporary hardship, apply for an Operation Share grant today. Grants do not have to be repaid and are funded by donations from your neighbors, UGI employees, and the broader UGI Company to help families in need.



Step 2. Enroll in an Income-Based Payment Plan

Customer Assistance Program (CAP)
Available at or below 150% Federal Poverty Limit

Avoid unpredictable utility bills and balance your household budget by paying the same amount each month. CAP customer bill amounts are based on the average bill at the property or a percentage of the total household income, averaging around 4-6% of total gross income. You can also receive debt forgiveness and bill forgiveness each month when you pay your bills on time.

**CAP percentage of income payments will vary based on customer household income, type of service, and poverty level. Accounts that purchase their gas from another supplier do not qualify.*



Step 3. Make Home Energy Efficiency Improvements

Low Income Usage Reduction Program (LIURP)
Available at or below 200% Federal Poverty Limit

Is your home cold and drafty? Have you tried lowering the thermostat but have not seen a difference in your bill? Check out the UGI Utilities Low Income Usage Reduction Program (LIURP). LIURP is available to homeowners and renters. Approved contractors install energy efficient measures in participating homes at no cost to the resident or homeowner. Most customers see an average of 20% reduction in their UGI bill.

Interested in any of the above programs or want to learn more?

[VIEW INCOME GUIDELINES AND SUBMIT AN INQUIRY FORM](#)

You may also call [800-UGI-WARM](tel:800-UGI-WARM) (800-844-9276) to speak with one of our WARM representatives about enrollment and any other questions you may have.

If you know of a UGI customer who could benefit from these programs, please pass along this information.

UGI esta comprometido a ayudar a los cliente que muestran un sincero esfuerzo para pagar sus facturas. Nuestros representantes estan disponible para proporcionarles informacion sobre los diferentes programas de asistencias. Haciendo referidos directos con las agencias locales, las cuales manejan fondos de asisitencia energeticas y ayudas con acuerdos de pago. UGI ofrece interpretes en varios idiomas solo debe llamar al [800-UGI-WARM](tel:800-UGI-WARM) para obtener más información.

**This is the recommended order of steps to get the most of these programs. However, all steps can be completed individually without another step being done.*



Email 2

Subject Line: Receive an Energy Assistance Grant for Your Utility Bill
Preheader: Apply for grants to pay off your past due or future bills.



Receive a Grant to Help Pay Your Bill

The first step to getting help with your bill is to apply for a grant to pay off your past due balance. There are two energy assistance grants available to UGI customers depending on the time of year and your household income.

Dynamic Content: LIHEAP season open or closed.

Open (Nov - Apr)

Closed



Customers at or below 150% FPL can apply for **Low Income Home Energy Assistance Program (LIHEAP)**.

LIHEAP helps families pay heating bills with a grant between the amount of \$200 - \$1,000. This money does not have to be paid back and gets sent directly to UGI to pay your bill.

This program is only available between November and April but can be reapplied for each year. If you qualify for this grant and the program is open, this should be the first grant you apply for.

Apply for a LIHEAP grant before it's too late! Please note the LIHEAP application has a new check box for customers who want to share their household income data with their utility. Please check that box so we can provide information about other programs that may help you.



Operation Share Grant
Available at or below 250% Federal Poverty Limit

If you are struggling to pay your bill due to temporary hardship, apply for an Operation Share grant today. Grants do not have to be repaid and are funded by donations from your neighbors, UGI employees, and the broader UGI Company to help families in need.



Customers at or below 150% FPL can apply for **Low Income Home Energy Assistance Program (LIHEAP)**.

This program is only available between November and April but can be reapplied for each year. If you qualify for this grant and the program is open, this should be the first grant you apply for.

LIHEAP helps families pay heating bills with a grant between the amount of \$200 - \$1,000. This money does not have to be paid back and gets sent directly to UGI to pay your bill.

Text A ASSISTANCE to 844-84 to receive a yearly SMS reminder when LIHEAP opens. We'll also send you updates on other assistance program information so you'll never miss out.

Interested in one of these grants or want to learn more?

[FILL OUT OUR QUICK ONLINE FORM TO GET STARTED](#)

You may also call [800-UGI-WARM](tel:800-UGI-WARM) (800-844-9276) to speak with one of our WARM representatives about enrollment and any other questions you may have.

If you know of a UGI customer who could benefit from these programs, please pass along this information.

UGI esta comprometio a ayudar a los cliente que muestran un sincero esfuerzo para pagar sus facturas. Nuestros representantes estan disponible para proporcionarles informacion sobre los diferentes programas de asistencias. Haciendo referidos directos con las agencias locales, las cuales manejan fondos de asisistencia energeticas y ayudas con acuerdos de pago. UGI ofrece interpretes en varios idiomas solo debe llamar al [800-UGI-WARM](tel:800-UGI-WARM) para obtener más información.



Email 3

Subject Line: Get a Payment Plan to Fits Your Income
Preheader: Ensure your bill remains manageable for your household.



A Long-Term Plan to Manage Your Bills

Get rid of your past due debt and ensure your bill remains manageable by enrolling in the [UGI Customer Assistance Program \(CAP\)](#).

This program is available to [customers at or below 150% FPL](#).



Manageable Bills for Your Household

With this program, you will pay the same amount each month, based on the average bill at your property or a percentage of your total income. **Average CAP customers only pay between 4- 6%* of their total gross income.**



Debt and Bill Forgiveness

By making on-time payments each month, you will receive debt forgiveness and bill forgiveness - **meaning your past due balance can be forgiven, and you will not have to pay the difference of your payment and actual bill amount.**

**CAP percentage of income payments will vary based on customer's household income, type of service, or poverty level. Accounts that purchase their gas from another supplier do not qualify for CAP.*

Interested in the UGI Customer Assistance Program or want to learn more?

FILL OUT OUR QUICK ONLINE FORM TO GET STARTED

You may also call [800-UGI-WARM](#) (800-844-9276) to speak with one of our WARM representatives about enrollment and any other questions you may have.

If you know of a UGI customer who could benefit from these programs, please pass along this information.

UGI esta comprometio a ayudar a los cliente que muestran un sincero esfuerzo para pagar sus facturas. Nuestros representantes estan disponible para proporcionarles informacion sobre los diferentes programas de asistencias. Haciendo referidos directos con las agencias locales, las cuales manejan fondos de asisitencia energeticas y ayudas con acuerdos de pago. UGI ofrece interpretes en varios idiomas solo debe llamar al [800-UGI-WARM](#) para obtener más información.



Email 4

Subject Line: Free Weatherization for Your Home
Preheader: Lower your utility bills and improving the comfort of your home.



Improve your home's energy efficiency when you sign up for the UGI Utilities **free** weatherization program **Low Income Usage Reduction Program (LIURP)**.

This program is available to customers at or below 200% FPL.

Watch this video to learn more about LIURP:



We have contractors that will install energy efficient measures into your home at no cost to you. **Most customers save 10-20% on their monthly energy bills.**



Program Benefits:

- No cost to qualifying UGI customers
- Reduces energy bills
- Makes your home more comfortable
- Warmer home during the heating season
- Cooler home during the summer



Following your Home Energy Evaluation, you may be eligible for any or all of these conservation services and/or equipment:

- Insulation
- Air sealing
- Heating system repairs
- Furnace clean, tune, and safety inspection
- Door and window caulking and weather stripping
- Carbon monoxide and smoke alarms

Interested in the UGI Low Income Usage Reduction Program?

[VISIT OUR WEBSITE FOR MORE INFORMATION](#)

You may also call [800-UGI-WARM](tel:800-UGI-WARM) (800-844-9276) to speak with one of our WARM representatives about enrollment and any other questions you may have.

If you know of a UGI customer who could benefit from these programs, please pass along this information.

UGI esta comprometido a ayudar a los cliente que muestran un sincero esfuerzo para pagar sus facturas. Nuestros representantes estan disponible para proporcionarles informacion sobre los diferentes programas de asistencias. Haciendo referidos directos con las agencias locales, las cuales manejan fondos de asisitencia energeticas y ayudas con acuerdos de pago. UGI ofrece interpretes en varios idiomas solo debe llamar al [800-UGI-WARM](tel:800-UGI-WARM) para obtener más información.



Email 5

Subject Line: Receive Assistance Reminders and More
Preheader: Stay up-to-date on assistance programs.



Stay Up-to-Date on Assistance Programs

Text ASSISTANCE to 844-84 to Sign Up!

Messages and data rates may apply. Reply HELP for help. Text STOP to stop. Terms and Conditions at <https://www.ugi.com/sms-terms-conditions/>.

Text ASSISTANCE to 844-84 to stay in touch with UGI via text alerts.

By opting into UGI Assistance text alerts, you'll receive enrollment reminders, plus more information and updates on the programs that may be available to you.

