



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY, PLEASE
REFER TO OUR FILE

M-2025-3054362
M-2025-3054366
P-2025-3054381

September 10, 2025

To: All Parties of Record at Docket Nos.:
M-2025-3054362, M-2025-3054366, & P-2025-3054381
UGI Utilities Inc. Universal Service and Energy Conservation Plan (USECP) for
2026-2030

Re: UGI 2026-2030 USECP Supplemental information

Overview

On July 24, 2025, the Commission entered an Order (July 24 Order) in the above-captioned proceeding and directed UGI Utilities, Inc (UGI) to file and serve supplemental information within 30 days (*i.e.*, by August 25, 2025). On August 25, 2025, UGI filed a letter at the above captioned dockets responding to the Commission's direction (UGI Supplemental Information).

The Commission's Bureau of Consumer Services (BCS) has reviewed the supplemental information provided by UGI in response to the July 24 Order and has identified areas where additional information is needed to fully comply with the July 24 Order:

Information Requested

LIURP

1. The Commission directed UGI to explain what a home and telephonic energy education session entails and how it communicates energy and education content and requirements to agency providers, including LIURP agency contractors. July 24 Order at 46.

UGI clarifies that the LIURP agencies conduct the audit and provide education to electric non-heating customers prior to weatherization, during the audit, based on findings and program measures to be installed. UGI notes that LIURP agencies provide energy efficiency tips when no program measures can be installed. UGI Supplemental Information at 16.

UGI's response suggests that a home and telephonic energy education session entails education provided to the customer by the LIURP agency based on the audit findings or energy efficiency tips when no program measures can be installed at the customer's home during the audit. Accordingly, UGI is directed to confirm if this is an accurate description of a home and telephonic energy education session or provide corrections.

2. The Commission directed UGI to indicate whether it performs routine health and safety measures and, if so, explain the parameters and allowance thresholds for those issues. July 24 Order at 48-49.

UGI reports that it addresses health and safety measures on a case-by-case basis to adhere to the allowance threshold for incidental repairs. UGI Supplemental Information at 16.

The intention of this request was for UGI to explain its parameters and allowance thresholds for performing routine health and safety measures. Parameters and allowance thresholds provide guidelines for contractors to appropriately address conditions associated with performing health and safety measures and/or incidental repairs (*i.e.*, repairs necessary for the proper function of an installed measure). For example, parameters can include a process for approving higher costs that exceed the allowance threshold if a contractor determines further repairs/measures are needed based on the findings of the energy audit.

Accordingly, UGI is directed to further explain its recommended parameters for performing health and safety measures on a case-by-case basis. UGI is also directed to confirm that it allows contractors to spend up to \$2,000 for homeowners and \$1,250 for renters on health and safety measures.

3. The Commission directed UGI to identify its process for disqualifying dwellings from LIURP, including, *inter alia*, what agencies or programs it refers deferred dwellings to; and how long it maintains a list of deferred dwellings. July 24 Order at 47-49.

In its response to this issue, UGI did not clarify if it refers customers to agencies or programs that could address the deferral/disqualification issue or clarify how long it maintains a list of deferred/disqualified dwellings. UGI Supplemental Information at 16-17.

Accordingly, UGI is directed to identify what agencies or programs it defers dwellings to and how long it maintains a list of deferred dwellings.

Operation Share

The Commission directed UGI to outline the circumstances under which a customer would qualify for an exception to Operation Share maximum grant amounts. July 24 Order at 64.

In the UGI Supplemental Information, UGI reports that it does not provide exceptions to maximum grant amounts. UGI Supplemental Information at 22.

In the 2020 USECP, UGI states that “exceptions to the maximum grant amount may be approved for special circumstance customers.” 2020 USECP at 15. This language appears again unchanged in the proposed 2026 USECP. Proposed 2026 USECP at 11.

Accordingly, if UGI does not provide exceptions to maximum Operation Share grant amounts, it is directed to provide an explanation of why the provision was included in the 2020 USECP and why UGI proposed to maintain this provision in the Proposed 2026 USECP. Further, if UGI is proposing to remove this provision, then it is directed to explain when it stopped allowing exceptions to maximum grant amounts and the reason for it.

If UGI is not proposing to remove this provision, then it is directed to outline the circumstances under which a customer would qualify for an exception to the maximum grant amount for Operation Share.

Needs Assessment

The Commission directed UGI to identify eligibility factors used to calculate the number of potentially LIURP-eligible customers and provide customer numbers for each eligibility factor, broken down by FPIG level. July 24 Order at 67-68.

UGI claims it is unable to break down customers in the FPIG levels of 0-150% and 151%-200%. UGI states that it evaluated customers whose usage exceeded the threshold and were income verified, adding that it follows the factors under 52 Pa. Code §§ 58.4(c)(1)-(4). UGI Supplemental Information at 23.

BCS questions UGI's inability to provide a breakdown of potentially eligible LIURP customers by FPIG levels (*i.e.*, 0-150% and 151% to 200%) when UGI clarified that this number was determined based on income-verified customers. UGI is directed to provide a more detailed justification for why this information cannot be provided.

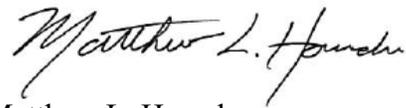
Conclusion

UGI must provide the information requested above in order to fully address the questions raised in the July 2024 Order. Accordingly, UGI must file and serve this additional information at the above-captioned dockets no later than ten (10) calendar days from the date of this letter. This determination has been made by BCS staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. *See* 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

Comments to the July 2024 Order, UGI's proposed 2026 USECP, supplemental information, and additional supplemental information must be filed no later than October 6, 2025. Reply comments must be submitted no later than October 21, 2025.

Questions may be directed to Nathan Froehlich, nfroehlich@pa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Matthew L. Homsher".

Matthew L. Homsher
Secretary

cc: Stephen M. DeFrank, Chairman, PUC
Kimberly Barrow, Vice Chairman, PUC
Kathryn L. Zerfuss, Commissioner, PUC
John F. Coleman, Commissioner, PUC
Ralph V. Yanora, Commissioner, PUC
Nathan Froehlich, BCS
Joseph Magee, BCS
Stephanie Wilson, Law Bureau