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September 22, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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

Dear Secretary Homsher:

On April 1, 2025, UGI Utilities, Inc. (“UGI” or the “Company”) filed its Universal Service and Energy Conservation Plan (“USECP”) for the 2026-2030 period in the above-captioned dockets. On July 24, 2025, the Commission entered an Order (“Order”) directing UGI to provide supplemental information within 30 days (i.e., by August 25, 2025). On August 25, 2025, UGI filed the requested supplemental information. On September 10, 2025, the Commission issued a Secretarial Letter explaining that while the Bureau of Technical Utility Services (“TUS”) had reviewed UGI’s supplemental information, it had further need for clarifying information. The Company was directed to provide the additional clarifications within 10 calendar days, i.e., by September 22, 2025. Accordingly, UGI hereby submits its response to TUS’s clarifying questions. Should you have any questions concerning this filing, please feel free to contact me.

Respectfully submitted,

/s/ Michael S. Swerling

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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: September 22, 2025

/s/ Michael S. Swerling  
Michael S. Swerling



**Responses to the Requests of TUS for Clarifying Information**  
**UGI Utilities, Inc. USECP for 2026-2030**  
**Docket Nos. M-2025-3054362, M-2025-3054366, and P-2025-3054381**  
**Submitted on September 22, 2025**

Low Income Usage Reduction Program (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.**

UGI Response: UGI confirms that TUS's description of UGI's LIURP-related energy education sessions is accurate. By way of further response, the process is as follows:

- The LIURP contractor performs an energy savings audit.
- The contractor meets with customer explaining: (1) what the audit entailed; (2) what the findings were, and (3) the measures to be covered by LIURP\*.
- If no measures can be installed, for example because of, mold, asbestos, rodent infestation or other items that cannot be remediated within the parameters of LIURP, the contractor will provide energy conservation tips to the customer. The contractor discusses how those conditions can be remediated. If the customer subsequently remediates those conditions in a manner that support the installation of energy savings measures, the contractor will then discuss the measures covered by LIURP.
- Once the meeting between customer and contractor has concluded, the contractor completes the Energy Education Form and the customer signs. Please see Attachment 1 for a copy of this form.
- After weatherization measures are completed, the Certificate of Completion form is signed by the customer.
- The Energy Education Form (Attachment 1) is retained by LIURP agencies for 4 years.

\*Most energy education sessions are completed in-person; however, if that is not feasible, the contractor will facilitate a phone call with the customer to review the items described above in the bulleted list.

- 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.**

UGI Response: LIURP contractors are authorized to spend up to \$2,000 for homeowners and \$1,250 for renters on existing health and safety measures. Regarding parameters for health and safety measures, contractors must install carbon monoxide and/or smoke detectors (if not previously installed and not in working order) for each LIURP job. Other health and safety measures include efficiency tests, installation of range hoods and/or dryer vents and/or exhaust fans and repairing minor leaks that may be identified by the contractors during the audit. Agency contractors are, at a minimum, Building Performance Institute (BPI) certified to assess environmental health and safety hazards in the home and how to remediate the hazards within the above-described parameters. The BPI website is <https://www.bpi.org/>.

- 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.**

UGI Response: LIURP agencies refer customers with deferrals to area agencies such as the state Weatherization Assistance Program (WAP), Pennsylvania Homeowners Assistance Fund (PAHAF), and county-specific whole home repair programs. If the customer is elderly, LIURP agencies will refer the customer to the local Area Agency on Aging (AAA). The deferrals are tracked by each agency and if the customer exceeds six

months without remediation, the agency will withdraw the account from the Company's Customer Outreach System. On a case-by-case basis, the customer may inquire about LIURP after the six-month time frame has passed, and if corrections have been made in the home, the customer will be resolicited by UGI to ensure the customer is still eligible for the Company's LIURP.

4. **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.**

UGI Response: The Company proposes removing the provision regarding exceptions to the maximum grant amount from its pending 2026-2030 USECP. If accepted, the Company will modify this language accordingly in its USECP Compliance filing for this proceeding. Operation Share maximum grant amounts were raised, from \$400 to \$600, through recent base rate case settlements<sup>1</sup>. The current grant amounts are adequate. Moreover, in the event the customer needs additional assistance that exceeds the Operation Share grant maximum, the Company can utilize CARES or recommend third party agencies. As such, UGI seeks to remove the maximum grant exception language from its USECP.

5. **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**

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<sup>1</sup> UGI Gas raised the grant to \$600 in the 2022 UGI Gas Base Rate Case at Docket Nos. R-2021-3030218, et al. UGI Electric raised the grant to \$600 in the 2023 UGI Electric Rate Case at Docket Nos. R-2022-3037368, et al.

**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.**

UGI Response: The Company provided a breakdown of potentially eligible customers, i.e., 13,780 in the FPIG 0-150% as part of the Needs Assessment in its USECP for 2026-2030. See 2026-2023 USECP at Table B-1 (Appendix B). This figure represents income-verified customers. The Company did not previously provide the breakdown of customers by FPIG levels at 151-200% because the data for that customer segment is largely based on self-certified income collected during phone calls with UGI Call Center Representatives. Thus, the Company cannot confirm this population of customers would be eligible for LIURP. The 151-200% segment of customers has only recently become eligible for LIURP and Operation Share, as LIURP and Operation Share were only expanded to those customers as of the 2022 Gas Base Rate Case and 2023 Electric Base Rate case, respectively.

However, in response to this request for supplemental information, the Company estimated the potential number of LIURP-eligible customers in the 151-200% FPIG using available customer income data, which as explained above is largely self-certified. The Company included the following customer parameters when performing this analysis.

- Exceeded the 877 CCF annual consumption threshold.
- Maintained 12 consecutive months of consumption history.
- Have not received LIURP in the prior 7 years.

Based on this analysis, the Company estimates there are 4,836 self-certified customers in the 151-200% FPIG range who may potentially be eligible for enrollment in LIURP. However, these customers would need to go through the Company's income verification process. The table below summarizes the Company's findings.

<b>UGI Gas LIURP Needs Assessment</b>	<b>Total</b>
151-200% FPIG <sup>1</sup>	4,836
0-150% FPIG (i.e., Customer Count Reported in USECP)	13,780
Updated Customer Count (Supplemental Response)	18,616

<sup>1</sup>. Represents the Company's estimate of the number of self-certified customers who may be eligible for LIURP. However, they have not gone through the Company's income verification process.