



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

November 7, 2025

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
UGI Utilities, Inc. – Gas Division
Docket No. M-2025-3032708
Supplemental Record to Joint Petition for Approval of Settlement

Dear Secretary Homsher:

Enclosed for electronic filing is the Supplemental Record to the Joint Petition for Approval of Settlement in the above-referenced matter. This supplemental information was directed to be filed as set forth in the Commission's Opinion and Order entered October 9, 2025.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', is written over a light blue horizontal line.

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
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GR/nb
Enclosures

cc: Office of Special Assistants (*via email* – ra-OSA@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**SUPPLEMENTAL RECORD TO
JOINT PETITION FOR APPROVAL OF SETTLEMENT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the Opinion and Order of the Pennsylvania Public Utility Commission entered October 9, 2025, in the above-captioned matter, the Bureau of Investigation and Enforcement (“I&E”) and UGI Utilities, Inc. – Gas Division (“UGI” or “Company”) (hereinafter referred to collectively as the “Parties” or “Joint Petitioners”) hereby submit this Supplemental Record to Joint Petition for Approval of Settlement (“Supplement”) to respond the Commission’s request for additional information for the Commission to make an informed decision as to whether the Joint Petition for Approval of Settlement (“Settlement Agreement”) filed with the Commission is in the public interest.

I. INTRODUCTION

1. The Parties to this Settlement Agreement are the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement, by its prosecuting attorneys, 400 North Street, Harrisburg, PA 17120, and UGI Utilities, Inc - Gas, a natural gas distribution company with a primary mailing address of 1 UGI Drive, Denver, PA 17517.

2. The Pennsylvania Public Utility Commission is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within this Commonwealth, as well as other entities subject to its jurisdiction, pursuant to the Public Utility Code ("Code"), 66 Pa.C.S. §§ 101, *et seq.*

3. I&E is the bureau within the Commission established to prosecute complaints against public utilities. *See Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) (delegating authority to initiate proceedings that are prosecutory in nature to I&E); *See also* 66 Pa.C.S. § 308.2(a)(11).

4. UGI is a "public utility" as that term is defined at 66 Pa.C.S. § 102, as it is engaged in providing public utility service as a natural gas distribution company ("NGDC") to the public for compensation.

5. Pursuant to Section 56.93(a) of the Commission's regulations, 52 Pa. Code § 56.93, an NGDC "may not interrupt, discontinue or terminate service without attempting to contact the customer or responsible adult occupant, either in person, by telephone or electronically with the customer's consent, to provide notice of the proposed

termination at least 3 days prior to the scheduled termination using one of the methods in this section.” If the method is telephonic, the regulation requires that the phone calls be made according to certain parameters.

6. Pursuant to Section 56.191(a) of the Commission’s regulations, 52 Pa. Code § 56.191(a), a “public utility may require a reconnection fee based upon the public utility’s cost as approved by the Commission prior to reconnection of service following lawful termination of the service.”

7. Section 501(a) of the Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Code.

8. UGI, in providing natural gas distribution service to the public for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations and orders, including 52 Pa. Code §§ 56.93(a) and 56.191(a).

9. On March 25, 2025, the Parties filed with the Commission a Joint Petition for Approval of Settlement along with their respective Statements in Support.

10. On May 8, 2025, the Commission entered an Opinion and Order requesting that the Settlement be published in the *Pennsylvania Bulletin* for public comment.

11. The Settlement received comments from the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Office of the Consumer Advocate (“OCA”).

12. On July 7, 2025, I&E filed Reply Comments.

13. On July 22, 2025, UGI filed Reply Comments.

14. On October 9, 2025, the Commission entered an Opinion and Order at the above docket (“October 9 Order”).

15. In the October 9 Order, the Commission determined that additional, specific information was needed.

16. The October 9 Order stated in pertinent part:

[A]fter review of the Comments and Reply Comments filed in the instant matter, we believe that the current record is insufficient and lacks important factual details which would permit us to determine if the Settlement is in the public interest.

October 9 Order at 23-24.

17. The October 9 Order also provided, in pertinent part, that the parties “shall have thirty (30) days from the entry date of this Opinion and Order to file supplemental facts and/or stipulated facts addressing this deficiency in support of the proposed Settlement Agreement.” October 9 Order at 3.

18. In compliance with the October 9 Order, the Parties provide the requested supplemental information as follows:

- 1. Were any security deposits or reconnection fees charged to verified low-income customers? If the answer is “yes,” provide the number of verified low-income customers who were charged a security deposit or reconnection fee.**

Response: No security deposits were charged to verified low-income customers. Reconnection fees were charged to 174 verified low-income customers.

2. Can UGI explain its reason for the delay in refunding reconnection fees for the March 2022 Incident (approximately one year delay) and April 2023 Incident (approximately five-month delay)?

Response: The initial delays were due to UGI working with the auto-dialer vendor to determine what customer accounts were impacted. Once accounts were identified as part of the Company’s evaluation and response to the incidents, UGI would process refunds to the customers. Further, UGI would do periodic review of accounts to help ensure that accounts which were reconnected and charged a reconnect fee would have those reconnection fees reversed and credited back to them. That periodic review was designed to address the issue on a rolling basis, as not every customer sought to reconnect service soon after the incidents.

Therefore, the Company wanted to be prepared for situations where a reconnection fee was assessed in error after the initial set of refunds.

Below is a table summarizing the reconnection fees that have been charged and the timeframes in which they were refunded to the customers affected by the incidents.

	March 2022 Terminations	April 2022 Terminations	April 2023 Terminations
Low-Income Customers	138	1362	97
Amount Charged	\$ 9,849.00	\$ 96,186.00	\$ 7,109.00
Amount Reversed (from 5/27/2022-6/1/2022)	\$ (1,252.00)	\$ (7,136.00)	NA
Amount Reversed (on 6/2/2022-6/3/2022)	\$ (3,139.00)	\$ (75,579.00)	NA
Amount Reversed (from 6/4/2022-3/9/2023)	\$ (438.00)	\$ (1,022.00)	NA
Amount Reversed (on 3/10/2023)	\$ (3,869.00)	\$ (10,742.00)	NA
Amount Reversed (from 4/4/2023-6/27/2023)	NA	\$ (219.00)	\$ (438.00)
Amount Reversed (6/28/2023)	NA	\$ -	\$ (5,138.00)
Amount Reversed (from 6/29/2023 -10/24/2025)	\$ (1,151.00)	\$ (1,488.00)	\$ (1,533.00)

3. Did UGI include interest on the reconnection refunds, in accordance with 66 Pa.C.S. § 1312(a) and 41 Pa. Stat. Ann. § 202?

Response: The Company did not include interest on the reconnection fee refunds, which was an oversight. The Company recognizes that it should have included interest on the reconnection fee reversals.

With that said, of the 825 customers who paid a reconnection fee, 389 of those customers have active service accounts with UGI. For these 389 customers, the interest calculated from the time the reconnection fee was paid until it was refunded at a 6% APR would have resulted in \$290.38 of interest.

The Company processed a \$290.38 interest credit back to 389 of the customers that are still active by the end of October 2025.

4. Provide the length of time that impacted households remained without service following the March 2022 Incident and the April 2023 Incident.

Response: For the March 2022 Incident, the average day of reconnection for the same customer that was disconnected was 44 days and the median number was 4 days. However, for terminations that occurred in April 2022, the average day of reconnection for the same customer that was disconnected was 15.3 days and the median number was 2 days. For the April 2023 incident, the average day of reconnection for the same customer that was disconnected was 41 days and the median number was 4 days.

5. Provide an explanation of when UGI identified the failure of the auto-dialer system and why UGI sent notifications of the failure to terminated customers only after BCS encouragement to do so.

Response: Before sending notifications to the terminated customers about the issues with the auto-dialer system, UGI needed to work with its vendor to get the list of customers impacted by the failures in the system. In some cases, this took time for the vendor to determine what the issue was as well as extract which customers were affected. Additionally, UGI wanted to have a clearer understanding of those issues and their likely causes, as well as the Company's planned corrective actions, so that it could respond to customer inquiries appropriately.

Timeline provided by UGI:

4/4/2022: UGI's Customer Service team became aware of an issue, via an informal complaint, with the auto-dialer system, related to the 3-day personal contact credit and collections termination-notice campaign.

4/8/2022: UGI's Customer Service team became aware of further issues via informal complaints with the auto-dialer 3-day personal contact credit and collections termination-notice campaign. Reports of both calls being placed prior to 5 p.m. as well as both calls being placed on the same day were received.

4/29/2022: Based on calls received, UGI became aware that when its auto-dialer system was performing 3-day Credit and Collection ("C&C") calls, an incorrect message in Spanish was being left when these calls were picked up by customer's voicemail.

5/4/2022: UGI's auto-dialer vendor confirmed issues relating to 3 categories (1) calls being made at the same time; (2) no PM attempt for calls; and (3) Spanish voicemail recordings being left during a C&C blaster campaign.

5/5/2022: Upon investigation with the Company's auto-dialer vendor, it was determined that the Spanish recording was incorrectly assigned to the 3-day C&C campaign. The vendor was instructed to immediately disable the incorrect voicemail message. UGI and its vendor began efforts to determine the total extent of condition for each issue.

5/27/2022: After identification of the impacted accounts for each dialer issue, the Company began corrective outreach to reconnect the impacted accounts. Outreach efforts included: (1) sending restoration notices to all accounts by mail; (2) sending email restoration notices to the 739 accounts where the Company had an email address; and (3) issuing field reconnect orders for all impacted accounts.

6/6/2022: UGI's Customer Service team met with the Bureau of Consumer Services ("BCS") and explained the issues and remediation efforts undertaken. BCS indicated that the Company was taking appropriate steps and requested updates regarding the remaining number of disconnected accounts.

6/13/2022: Updates were provided to BCS.

6/21/2022: Updates were provided to BCS.

6/27/2022: Updates were provided to BCS.

7/5/2022: Updates were provided to BCS.

8/4/2022: The Bureau of Investigation and Enforcement (“I&E”) became involved when one of its attorneys reached out to UGI requesting contact information for a Company regulatory attorney. I&E sent data requests to UGI initiating this informal investigation.

6. Does UGI regularly audit and evaluate the performance of its auto-dialer system?

Response: Prior to the dialer incidents, it was the contractual commitment with the vendor to operate in accordance with the dialer system’s design and the Commission’s applicable regulations. The Company engaged in regular discussions with the vendor and addressed system issues as they arose. Post dialer incidents, please see response to Supplemental Statement 7, below.

7. Has the process or procedure in question number 6, changed since either the March 2022 or the April 2023 Incident?

Response: Yes. UGI Gas’s auto-dialer system vendor now performs audits/tests of its programming before releasing updates to the system, and UGI Gas continues to perform manual audits of the dialer system file logs reviewing the call windows for the sent messages. UGI Gas also performs: (1) a weekly call recording screening on a sample of calls received during that two-week period; (2) a daily analysis of the call data to see if any calls were made outside of the Commission-specified calling window; and (3) a bi-annual collaboration with its auto-dialer system vendor to conduct an end-to-end test of the credit and collection campaign to ensure calls have been dialed as expected. For nearly two years, no additional issues with the auto-dialer system have been found.

8. Any other additional information pertinent to these events that can assist the Commission in making a determination in this matter.

Response: UGI spent \$17,653 to restore service to customers impacted by the subject terminations. The majority of these costs related to voluntary restoration activities.

WHEREFORE, the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement and UGI Utilities, Inc. – Gas Division respectfully request that the Commission accept the within Supplemental Record as responsive to the October 9 Order and approve the Joint Petition for Approval of Settlement as supplemented without modification and in its entirety as being in the public interest.

Respectfully submitted and filed by:

Date: November 7, 2025



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Date: November 7, 2025



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