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PENNSYLVANIA
UTILITY LAW PROJECT

November 10, 2025

VIA E-MAIL

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

Re: UGI Utilities, Inc. Proposed Universal Service and Energy Conservation Plan for 2026-2030 and Petition for Waiver:

Docket Nos. M-2025-3054362, M-2025-3054366, P-2025-3054381

Dear Secretary Homsher:

Attached for filing, please find the **Reply Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** for the above related proceeding.

As indicated by the attached Certificate of Service, service on the parties was by email only.

Respectfully submitted,

Lauren N. Berman, PA
Counsel for CAUSE-PA

CC: Certificate of Service
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Certificate of Service

I hereby certify that I have, on this day, served copies of the **Reply Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL ONLY

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Date: November 10, 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

UGI Utilities, Inc. Universal Service and Energy : M-2025-3054362
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REPLY COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA

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November 10, 2025

I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA),¹ through its counsel at the Pennsylvania Utility Law Project, submits these brief Reply Comments pursuant to the July 24, 2025 Order Directing Supplemental Information and Establishing Comment Period (hereinafter, July 2025 Order), which invited interested parties to submit comments and reply comments to the proposed Universal Service and Energy Conservation Plan (USECP) for 2026-2030 of UGI Utilities, Inc (UGI or the Company) (Proposed 2026 USECP or Plan).

On October 6, 2025, CAUSE-PA and the Office of Consumer Advocate (OCA) each submitted initial Comments in response to UGI's Proposed 2026 USECP and the issues identified in the Commission's July 2025 Order. On October 28, 2025, CAUSE-PA filed Amended Comments, correcting a factual error regarding the Commission's pending Low Income Usage Reduction Program (LIURP) regulations in its initial comments.

CAUSE-PA submits the following Reply Comments for the Commission's consideration in response to OCA's initial Comments. For the sake of brevity, CAUSE-PA will not reiterate the extensive arguments and recommendations raised in its initial Comments. CAUSE-PA stands by its initial recommendations and incorporates those arguments and recommendations by reference herein. Moreover, CAUSE-PA does not intend to address and respond to every argument and recommendation raised by OCA in its initial Comments. To the extent that any argument raised in OCA's initial Comments is not addressed, this does not indicate CAUSE-PA's agreement with or opposition thereto. Nevertheless, notwithstanding this reservation, CAUSE-PA notes its strong support for OCA's recommendation that UGI increase coordination of its CAP enrollment and

recertification processes across its Gas and Electric divisions.¹ CAUSE-PA also supports OCA's recommendation that UGI adjust the minimum CAP bill amounts to ensure the minimum bill for combined gas and electric customers is equal to the minimum bill for electric heating customers.² CAUSE-PA will comment in more detail below regarding OCA's recommendations regarding maximum CAP credit limits and its recommended methodology for appropriately determining annual LIURP budgets.

II. REPLY COMMENTS

A. CAUSE-PA continues to strongly oppose the introduction of arbitrary and punitive maximum credit limits for UGI Electric CAP customers and supports UGI's focus on the delivery of enhanced efficiency services to high usage customers.

Consistent with its initial Comments, CAUSE-PA strongly opposes the imposition of punitive maximum CAP credit limits for UGI's Electric CAP customers.³ As discussed in detail therein, the available data clearly shows that maximum CAP credit limits are ineffective and unjustified when all relative costs and benefits are weighed and, if implemented, would cause disproportionate harm on UGI's most vulnerable households.⁴ If maximum CAP credits are implemented for UGI Electric's CAP customers, collections and termination rates are likely to increase, contrary to the statutory universal service requirements in the Choice Act.⁵

OCA also raised concerns in its initial Comments regarding implementation of maximum CAP credits for UGI's Electric CAP customers.⁶ OCA similarly questioned the nexus between CAP costs and the Commission's proposed solution, noting that "the potential mechanism available to control CAP costs is lengthy...and the propriety of potential mechanisms available

¹ OCA Comments at 19-21.

² OCA Comments at 38.

³ See CAUSE-PA Comments at 55-66.

⁴ CAUSE-PA Comments at 58-66.

⁵ Id.; 66 Pa. C.S. 2802(9)-(10), 2803, 2804(9)

⁶ See OCA Comments at 8-19.

to control CAP costs are highly dependent on the level of the CAP costs, the cause of the high CAP costs, and whether high CAP costs are permanent or temporary.”⁷ OCA specifically raised the impact of commodity price increases on the high CAP costs that customers have experienced over the last several years and noted that a maximum CAP credit limit would not address the issue of commodity prices increases as they have no relation to a CAP customer’s usage.⁸

Like OCA, CAUSE-PA noted the myriad other possible reasons for increasing CAP costs that have no relation to a CAP customer’s usage, including the actual significant increase in commodity costs over time.⁹ Significantly increasing the likelihood that many CAP customers will have their service involuntarily terminated due to circumstances beyond their control is unjust, unreasonable, and contrary to the Company’s and the Commission’s obligations under Public Utility Code and Commission policy.¹⁰ As shown in our initial Comments, increased collections costs and terminations are the likeliest outcome of the imposition of arbitrary maximum CAP credits.¹¹

While we do not fully agree with every detail of OCA’s proposed monitoring and alternative maximum CAP credit recommendations, we strongly agree with OCA’s assertion that “additional data be collected and cost monitoring be implemented to determine the correct approach” prior to implementing additional cost control measures.¹² If the Commission wishes to properly address what it sees as excessive costs of a CAP program, it should implement a comprehensive analysis of both the causes of increasing CAP costs and potential alternative cost control measures, rather than require the unilateral imposition of punitive maximum CAP credit

⁷ Id. at 14.

⁸ Id. at 15.

⁹ CAUSE-PA Comments at 62-66; Table 3.

¹⁰ 66 Pa. C.S. § 2802 (9)-(10), 2803, 2804(9); 52 Pa. Code § 69.26.

¹¹ CAUSE-PA Comments at 59; Table 2.

¹² OCA Comments at 14-15.

limits. In the interim, we continue to support UGI's current focus on targeting enhanced efficiency services and education for CAP customers with high usage. This approach prioritizes *prevention*, and targets the root cause of high usage; namely, the inability of vulnerable households to adopt comprehensive efficiency services necessary to reduce monthly bills over the long term.

B. CAUSE-PA supports OCA's recommendation to establish LIURP budgets at a level commensurate with the need for services, utilizing a revised needs assessment.

In its initial Comments, OCA argues that setting LIURP budgets either in a base rate proceeding or increasing at a *pro forma* 3% per year process would not set an adequate LIURP budget and does not consider the factors identified in 52 Pa. Code Section 58.4(c) as revised.¹³ OCA further notes that at UGI's current job number projections, it would take over 80 years for all estimated households potentially in need of LIURP to be provided LIURP services.¹⁴ Instead of establishing LIURP budgets exclusively in base rate cases or at a *pro forma* 3% per year, OCA recommends that the LIURP budget be tied to UGI's needs assessment, noting that UGI has not set forth a nexus between its current budget, its needs assessment, and the number of units being served each year.¹⁵

In its initial Comments, CAUSE-PA noted serious concerns with the accuracy of UGI's needs assessment and reiterates those concerns here.¹⁶ UGI's current narrow definition of confirmed low income customers is inconsistent with the explicit definition of that term and results in a circular needs assessment – permitting UGI to assess the *need* for assistance based only on the number of customers that already participate in UGI's programs. A needs assessment

¹³ *Id.* at 41.

¹⁴ *Id.* at 43.

¹⁵ *Id.* at 42.

¹⁶ CAUSE-PA Comments at 112.

must fairly assess the full scope of customers likely to require assistance in the future, not those who have already been verified for assistance in the past.

Thus, while we support OCA's recommendation that LIURP budgets be tied to the Company's needs assessment, rather than arbitrarily determined, we also emphasize that the needs assessment must be an accurate one. CAUSE-PA reiterates our recommendation that the Commission require UGI to recalculate its confirmed low income customer count based on the definition approved in the 2025 Rate Case Settlement¹⁷ and amend its needs assessment accordingly. Once a more accurate needs assessment has been completed, it should be used to appropriately determine the Company's LIURP budget past 2026, utilizing revised 52 Pa. Code Section 58.4(c) as a guide.¹⁸

We further support OCA's recommendation that the Commission develop a process for UGI (and all gas and electric utilities) to provide information at least every two years demonstrating that its LIURP budget is sufficient and that it accounts for any changes that occur (including intervening rate increases).¹⁹ The Commission should further ensure that stakeholders have the opportunity to comment on and propose adjustments to the Company's LIURP budget during this process.

III. CONCLUSION

CAUSE-PA thanks the Commission for its thoughtful consideration of the issues and recommendations raised above and in CAUSE-PA's initial Comments. We urge the Commission to act in accordance with CAUSE-PA's Comments and Reply Comments to ensure that all

¹⁷ See Joint Petition for Approval of Settlement of All Issues, Docket No. R-2024-3052716, (Filed July 9, 2025) at ¶ III.3.67(a)-(b), Final Order approving the Joint Petition for Settlement without modification issued September 11, 2025, defining Confirmed low income consistent with the Commission's definition in 52 Pa. Code 62.2 and 69.262.

¹⁸ LIURP Final Form Rulemaking, Docket No. L-2016-2557886, Final Order at 127-128 (Issued March 13, 2025).

¹⁹ OCA Comments at 43.

customers – regardless of income – are able to access safe, affordable service within UGI’s service territory.

Respectfully Submitted,



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