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File #: 207056

November 10, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
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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:

Enclosing for filing on behalf of UGI Utilities, Inc. – Gas Division (“UGI Gas”) and UGI Utilities, Inc. – Electric Division (“UGI Electric”) (collectively, “UGI” or the “Company”) are the Company’s Reply Comments in the above-captioned proceeding.

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

Respectfully submitted,


Devin Ryan

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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: November 10, 2025



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UGI Utilities, Inc. – Gas Division	:	
Universal Service and Energy	:	Docket No. M-2025-3054362
Conservation Plan for 2026-2030	:	
UGI Utilities, Inc. – Electric Division	:	
Universal Service and Energy	:	Docket No. M-2025-3054366
Conservation Plan for 2026-2030	:	
UGI Utilities, Inc. – Gas Division Petition	:	Docket No. P-2025-3054381
for Limited Waiver of 52 Pa. Code	:	

**REPLY COMMENTS OF
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Date: November 10, 2025

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I. INTRODUCTION

On April 1, 2025, UGI Utilities, Inc. - Gas Division and UGI Utilities, Inc.- Electric Division (collectively “UGI” or “Company”) jointly filed their Proposed Universal Service and Energy Conservation Plan (“USECP” or “Plan”) for 2026-2030 with the Pennsylvania Public Utility Commission (“Commission” or “PUC”), in compliance with 52 Pa. Code Sections 54.74 and 62.4, relating to electric and natural gas universal service and energy conservation reporting requirements.

On July 24, 2025, the Commission entered its Order Directing Supplemental Information and Establishing Comment Period (“*July 2025 Order*”) in the above-captioned proceedings. The Commission’s *July 2025 Order* withheld approval of the Plan pending the review of additional requested information and the submission of comments and reply comments. On August 20, 2025, the Commission issued a Secretarial Letter granting the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania’s (“CAUSE-PA”) Petition requesting a 20-day extension of the comment period. UGI filed Supplemental Information responding to the Commission’s questions set forth in the *July 2025 Order* on August 25, 2025, and additional Supplemental Information in response to the Commission’s September 10, 2025 Secretarial Letter on September 22, 2025.

Comments were filed by the Office of Consumer Advocate (“OCA”) and CAUSE-PA. In these Reply Comments, UGI addresses the recommendations, issues, and concerns raised in those Comments.

At the outset, UGI believes that there are many areas of agreement between the Company and the other parties. UGI highlights these areas below and is agreeable to modifying its Proposed USECP to reflect those areas of agreement, subject to the Commission’s review and approval. Regarding the parties’ recommendations that the Company opposes, UGI provides the following

responses to explain the Company's position. Further, if the Company does not specifically respond to a party's issue or recommendation, the lack of a response should not be interpreted as UGI agreeing with that party. Moreover, UGI does not believe there are any issues of material fact in dispute that would require the case to be referred to the Commission's Office of Administrative Law Judge for further review and hearings. Thus, the Company respectfully requests that the Commission enter a Final Order approving UGI's USECP, as modified by these Reply Comments.

II. REPLY COMMENTS

A. CAP

1. Accepting 30 Days or 12 Months of Income

In its Comments, CAUSE-PA finds it unclear whether UGI has consistent rules for when and how to calculate household income. (CAUSE-PA Comments, p. 15.) Therefore, CAUSE-PA recommends that UGI amend the language in its USECP to clarify that it will accept 30 days or 12 months of income, whichever is most beneficial for the applicant and most reflective of actual household income. (CAUSE-PA Comments, p. 16.) Further, CAUSE-PA recommends that UGI use whichever income calculation is more beneficial to the Customer Assistance Program ("CAP") customer and most reflective of the household's actual income. (CAUSE-PA Comments, p. 17.)

The Company agrees with CAUSE-PA's recommendation and maintains that it already utilizes the most beneficial income calculation. Although UGI's 2026-2030 USECP does not explicitly state this fact, using the income calculation that is most beneficial to the CAP customer and most reflective of the household's actual income is standard practice and how Community Based Organizations ("CBOs") are trained.

In addition, CAUSE-PA recommends that UGI explicitly state in its 2026-2030 USECP that it will accept a W-2 form for the previous calendar year showing a full year of work, a prior

year award letter for federal benefits if the current year is not available, and Unemployment Compensation documentation that reasonably aligns with the date of application. (CAUSE-PA Comments, p. 17.)

The Company agrees with this recommendation and currently accepts these documents for use in enrollment.

Lastly, CAUSE-PA recommends that UGI develop a table summarizing the types of income and the documents accepted as proof of household income, as well as the timeline for recertification associated with each. (CAUSE-PA Comments, p. 17.) Further, CAUSE-PA believes that this information should be shared with members of its Universal Service Advisory Committee (“USAC”) to ensure its income documentation policies are adequately inclusive to capture the many ways that households may need to verify their source of income. (*Id.*) Additionally, CAUSE-PA believes that this table should be filed as an appendix to its USECP to improve clarity for program administrators and applicants of what is required to apply. (*Id.*)

The Company maintains that this documentation list already exists and is currently utilized by UGI staff and CBOs. The Company has created the requested matrix and will add it as an appendix to its 2026-2030 USECP as part of its compliance filing to aid administrators and applicants in what is required to apply. Further, the matrix will be added to the CAP application once the Common Application Form is used. The matrix is provided below:

Type of Document	Acceptable Period
Paystub	Prior 30 days or Most Recent Pay Period Available
W-2 Form	Most Recent Available
Benefit Letter	Prior year if current award letter is not yet available
Bank Statement	Last 30 days
Social Security	Prior year if current award letter is not yet available
Pension	Prior year if current award letter is not yet available
Disability	Prior year if current award letter is not yet available
Supplemental Security Income	Prior year if current award letter is not yet available
Alimony Support	Most Recent Available
Unemployment Determination Letter	Current approval letter
Notarized Letter Stating Income*	Most Recent Available (within 30 days)
Zero Income Form	Must be completed at the CBO
Rental Income	Last 30 days
*This is if none of the other document types listed are available. This would apply to seasonal or gig work.	

2. Average Bill

In its Comments, CAUSE-PA discourages UGI’s default practice of using a previous tenant’s usage to calculate the non-Percentage of Income (“non-PIP”) billing amount when there are not 12 months of historical usage for the current tenant. (CAUSE-PA Comments, p. 19.) Therefore, CAUSE-PA recommends that UGI evaluate which is more affordable, the average residential bill or the average bill based on the previous tenant’s usage, and the CAP customer should then receive the most affordable option. (*Id.*) Further, CAUSE-PA recommends that UGI begin including the current tenant’s available monthly usage data in its periodic CAP rate calculation to provide the tenant with a bill that most closely approximates their actual usage. (*Id.*)

CAUSE-PA’s recommendations are not minor changes and would require IT enhancements. Every month, the Company would be required to calculate the average bill in a manner that is very complex and labor-intensive, which would result in the Company incurring additional staffing-related costs. The Company maintains that its current default practice is not in violation of any PUC regulations and, therefore, the process does not need to be changed.

Additionally, CAUSE-PA recommends that the Commission require UGI to reevaluate and adjust CAP rates monthly to ensure the participant receives the most affordable billing option. (CAUSE-PA Comments, p. 20.) CAUSE-PA also proposes that the Commission require UGI to integrate the actual usage into its calculation of average bill CAP rates as soon as possible into its periodic average bill calculation. (*Id.*) Further, CAUSE-PA recommends that UGI adjust the applicable CAP rate and/or average bill monthly, rather than quarterly, so CAP participants are always receiving the most affordable bill available. (*Id.*)

The Company disagrees with this recommendation and finds that changing CAP rates on a monthly basis could cause customer confusion. Further, 66 Pa.C.S. § 1303 states:

No public utility shall, directly or indirectly, by any device whatsoever, or in anywise, demand or receive from any person, corporation, or municipal corporation a greater or less rate for any service rendered or to be rendered by such public utility than that specified in the tariffs of such public utility applicable thereto. The rates specified in such tariffs shall be the lawful rates of such public utility until changed, as provided in this part. Any public utility, having more than one rate applicable to service rendered to a patron, shall, after notice of service conditions, compute bills under the rate most advantageous to the patron.

Additionally, CAUSE-PA proposed a monthly CAP rate review for customers in UGI Gas's 2019 Base Rate Case. The Company opposed that recommendation in rebuttal testimony. UGI Gas explained that it was unnecessary for the Company to create a new system program to periodically review a low-income customer's income level or payment ability because UGI Gas already has many ways through which a low-income customer can provide current income information to the Company or one of its CBOs. In addition, during the CAP re-certification process, the CAP rate available to a customer is reviewed, and if necessary, the customer will be placed on a more beneficial rate at that time. Ultimately, under Paragraph 47 of the Commission-approved Settlement in that case, UGI Gas agreed to review, on a quarterly basis, CAP rates for those enrolled in the average bill or percentage of income CAP rate plans to determine whether a more

affordable rate plan is available. UGI Gas does not see any need to deviate from the terms of that Commission-approved process, which has been in place since 2019. Furthermore, UGI Electric follows a similar process with quarterly reviews for CAP customers.

3. Identification Documents

In its Comments, CAUSE-PA notes that UGI does not provide applicants notice that disclosure of their Social Security Number (“SSN”) is optional, and finds that this serves as a deterrent for eligible households from seeking enrollment in the program. (CAUSE-PA Comments, p. 22.) Therefore, CAUSE-PA recommends that UGI make SSN disclosure optional on the application. (*Id.*)

The Company takes no issue with this recommendation and states that it will be using the Commission’s Common Application Form, which does not require disclosure of applicant SSNs.

CAUSE-PA also opposes UGI’s imposition of additional identification requirements for customers to enroll in its universal service programs. (CAUSE-PA Comments, p. 22.) It recommends that no additional proof of ID is required for a customer to enroll in UGI’s universal service and energy conservation programs. (*Id.*) CAUSE-PA requests that the applicants not be required to provide additional identification documentation for UGI’s universal service programs. (CAUSE-PA Comments, p. 24.) Further, CAUSE-PA asks the Commission to refrain from directing UGI to require identification documentation from CAP applicants and all other adult household members. (*Id.*) If identification is required for CAP applications, CAUSE-PA recommends that UGI broaden its list of identification accepted for CAP enrollment. (CAUSE-PA Comments, p. 25.)

UGI is not willing to modify the list of accepted identification methods. UGI maintains that its process is consistent with other utilities, and its list of identification methods is adequate. In Columbia Gas of Pennsylvania, Inc.’s (“Columbia”) USECP proceeding, the Commission

declared that while “verifying the identity of each household member can pose a burden for some households, particularly those who do not have – or choose not to provide – SSNs for each member and may not have government or school identification for children,” the Commission still “ha[s] concerns that eliminating identification requirements puts these programs at greater risk of fraud at the expense of other ratepayers.” *Columbia Gas of Pa., Inc. Universal Service & Energy Conservation Plan for 2024-2028 Submitted in Compliance with 52 Pa. Code § 62.4*, Docket No. M-2023-3039487, 2024 Pa. PUC LEXIS 107, at *25 (Order entered Apr. 4, 2024). Consistent with that precedent, UGI does not believe it would be prudent to eliminate CAP identification requirements altogether from its USECP.

Similarly, in its Comments, OCA agrees that standardization of documentation for CAP and Low-Income Usage Reduction Program (“LIURP”) would help to streamline enrollment in the programs and should be approved. (OCA Comments, p. 25.) It suggests that the standardization of documentation for CAP and LIURP should not narrow eligibility for other low-income assistance that is available for low-income customers who may not be enrolled in CAP. (*Id.*)

UGI maintains that its Proposed 2026-2030 USECP has standardized income requirements and documentation. Previously, the Company had explicit income requirements outlined for CAP but did not treat LIURP or Operation Share the same way. The Company now has consistent requirements that apply to Operation Share, LIURP, and CAP. This change, which is included in the USECP, was implemented to avoid customer confusion by standardizing income requirements and documentation to align with all Universal Services Programs.

Also, OCA suggests that UGI should not require burdensome documentation for consumer protections, such as qualifications of deposit exemptions and winter shut-off protection. (*Id.*)

In response, UGI states that when it receives a new customer application, it runs an Experian credit check on the applicant. If the credit check returns a red flag, the applicant must submit additional proof of income or identity. Otherwise, when a customer establishes service, there is no request for proof of income or identification in order to create the account. This also applies to CAP customers. UGI does not collect identification, income, or household information when a new account is established unless the applicant fails their credit check.

4. Common Application Form

In its Comments, CAUSE-PA supports policies and programs like the Common Application Form (“CAF”) that will simplify and streamline the universal service enrollment. (CAUSE-PA Comments, p. 27.) However, CAUSE-PA is concerned that allowing UGI to make changes to the CAF may permit the Company to include additional unnecessary and burdensome requirements that will undermine the purpose of the streamlined CAF. (CAUSE-PA Comments, pp. 27-28.)

UGI agrees with these comments and is implementing the CAF for CAP. Further, the CAF was reviewed with the USAC on October 14, 2025. The two edits suggested by CAUSE-PA were made, and no other concerns were raised during the USAC call.¹

Also, CAUSE-PA states that it is concerned that the current UGI application appears to require the disclosure of the applicant’s SSN even though that field is optional. (CAUSE-PA Comments, p. 28.) Additionally, CAUSE-PA avers that the applicant’s gender disclosure is unnecessary. (*Id.*) Further, CAUSE-PA believes that requiring applicants to collect a list of household monthly expenses is administratively burdensome and an unnecessary exercise. (*Id.*)

¹ The changes to the application included (1) making the account number optional, and (2) changing the language of the question “Do you currently have an alternate supplier for your energy (also known as Choice)?” to add “also known as Choice or Shopping.”

CAUSE-PA also recommends that the Commission require UGI to immediately update its existing CAP Application to specify that SSNs are optional and to remove the gender and household expense fields from the application. (*Id.*)

UGI agrees with these comments and believes that they are no longer an issue due to the adoption of the CAF.

5. CAP Application Form

In its Comments, OCA recommends that the CAP application be amended to specifically inform CAP applicants to exclude minor income so that applicants are aware that the minor child's income may not be included in the calculation of household income. (OCA Comments, pp. 38-39.)

UGI agrees with this recommendation and maintains that this matter is no longer of issue with the implementation of the CAF. Further, UGI's Proposed 2026-2030 USECP states that minor income is not included.

6. Online Application

In its Comments, CAUSE-PA recommends that UGI begin immediate implementation of an online CAP Application using the CAF and strongly recommends that the Commission direct UGI to begin developing its online application process within 60 days of approval of its 2026-2030 USECP. (CAUSE-PA Comments, pp. 30-32.)

To clarify, the CAP Policy Statement suggests, but does not require, creating an online application. Regardless, UGI is currently looking to replace its Customer Outreach System ("COS"), which includes an online application. UGI is aiming for a comprehensive system, as opposed to a piecemeal solution that has been implemented over the past few years. UGI does not want to rush this process and create a segmented system. Instead, the Company requires an

integrated solution which will take time to build out and is estimated to cost approximately \$5-6 million.

In their Comments, both CAUSE-PA and OCA assert that UGI may be overestimating the time and cost needed to implement the online application and request that UGI provide further information regarding the reasons why it would be so expensive to implement an online application. (CAUSE-PA Comments, p. 30; OCA Comments, p. 26.) Further, OCA avers that UGI has not provided a sufficient basis upon which to demonstrate that it is not possible for UGI to implement an online application. (OCA Comments, p. 27.) Therefore, OCA recommends that UGI be directed to implement an online application in a cost-effective manner and to demonstrate that the projected costs are, in fact, necessary to implement an online application. (*Id.*) Additionally, CAUSE-PA recommends that UGI optimize the online CAP application process for mobile devices to better serve low-income applicants. (CAUSE-PA Comments, pp. 30-31.)

UGI maintains that the original cost referenced to implement the online application was for a comprehensive replacement of the Company's COS, which included incorporating an online portal where customers would apply and see updates on the status of their application. The estimated costs reflect that. The CAP Policy Statement suggests that utilities have an online application, but it does not require them to implement one. There are many factors UGI must consider when implementing a new online application. UGI maintains that implementing a new COS with online application functionality will cost \$5-6 million. Further, the online application will be optimized for mobile devices to better serve low-income applicants, as recommended by CAUSE-PA.

Lastly, CAUSE-PA recommends that UGI consult and coordinate with other Natural Gas Distribution Companies that have successfully implemented an online application to learn how to

reduce costs and shorten the estimated timeframe for establishing this process. (CAUSE-PA Comments, pp. 31-32.)

The Company agrees with this comment. Within 90 days of a final PUC order, the Company will engage with other utilities to explore the feasibility and research potential solutions for an online application.

7. UGI Electric CAP Automatic Enrollment

In its Comments, CAUSE- PA recommends that UGI no longer require its auto-enrolled electric customers to submit additional income identification (either at the time of enrollment or at recertification) to receive a Percentage of Income (“PIP”) CAP rate. (CAUSE-PA Comments, p 33.)

UGI utilizes the Pennsylvania Department of Human Services (“DHS”) income data, if available, to auto-enroll and recertify an electric customer at a PIP. For electric, UGI auto-enrolls any customer who has not requested to opt-out of auto-enrollment and has received Low-Income Home Energy Assistance Program (“LIHEAP”) (regardless of whether they checked the box). If the Company does not have income on file and the customer did not check the box indicating they received LIHEAP, UGI does not have the applicant’s income and must enroll at the average bill. The customer could provide income to get a PIP.

In addition, CAUSE-PA recommends that UGI follow CAP Policy Statement guidelines for recertification timelines for all customers, including auto-enrolled electric CAP customers, depending on the households’ sources of income. (CAUSE-PA Comments, pp. 33-34.)

UGI maintains that it is in compliance with the CAP Policy Statement regarding this issue.

Furthermore, CAUSE-PA asserts that, consistent with the CAP Policy Statement, the process of using LIHEAP data to confirm ongoing eligibility should be completed every three years, not every year. (CAUSE-PA Comments, p. 34.)

The Company maintains that it currently only requires recertification every three years if LIHEAP is on the customer's account. However, Paragraphs 59(b) and (c) of the UGI Gas 2025 Base Rate Case Settlement terms will change this. Instead, if LIHEAP is received during the prior season or current season, no recertification is required.

Next, CAUSE-PA notes its support of the extension of UGI's policy of not requiring yearly recertification for electric auto-enrolled customers who subsequently provide income documentation to all CAP customers who receive LIHEAP and whose primary source of household income is Social Security, Supplemental Security Income ("SSI"), or pensions. (CAUSE-PA Comments, p. 35.) However, CAUSE-PA believes that yearly recertification for a significant number of CAP customers is inconsistent with the CAP Policy and states that it is concerned by UGI's high default rates as a result of more frequent recertification. (CAUSE-PA Comments, p. 36.) Therefore, CAUSE-PA recommends that UGI do the following to reduce high default (failure to recertify) rates: (1) revise its Proposed 2026-2030 USECP to establish its CAP recertification timeframes as described above, (2) consult with its USAC on needed improvements to its recertification communications and to develop additional information for CAP participants about changes to the recertification timeframes, (3) provide training to all call center employees, universal service program staff, and CBOs to ensure they are aware of the adjusted timeframes for CAP recertification, given that these recertification timeframes would represent changes to UGI's policies and procedures, and (4) confirm that UGI is utilizing LIHEAP data to perform recertifications and to determine appropriate PIP rates where the income information is complete (*e.g.*, with the exception of self-employment). (*Id.*)

The Company has identified that prior submissions of the Universal Service Reporting Requirements ("USRR") data relative to CAP default rates inadvertently included removal reasons

that should not be considered “default”, and not just those identified under the report requirements. The definition in the USRR states, “The CAP Default Rate is calculated by dividing the average monthly CAP participation at each poverty level, by the total annual number of defaults for each poverty level. CAP customers are considered non-compliant (in default) when they fail to meet program requirements. Actions resulting in CAP defaults include missing payments, making late payments, or failing to recertify. CAP customers who voluntarily leave the program are not counted in the default rate.” The Company has recalculated the default counts to include only removal from CAP for failure to recertify and removal from CAP for non-payment. That updated analysis is below:

Default Exit % Rate			
2024	50% FPL	51-100% FPL	101-150% FPL
Reported on USRR	51.2%	39.1%	48.5%
New Default Exit %	30.0%	20.7%	22.6%

2023	50% FPL	51-100% FPL	101-150% FPL
Reported on USRR	40.6%	31.9%	36.1%
New Default Exit %	19.1%	14.1%	13.7%

2022	50% FPL	51-100% FPL	101-150% FPL
Reported on USRR	55.2%	47.1%	37.4%
New Default Exit %	31.9%	26.2%	18.9%

2021	50% FPL	51-100% FPL	101-150% FPL
Reported on USRR	40.0%	35.7%	36.7%
New Default Exit %	17.3%	13.5%	10.9%

Additionally, CAUSE-PA states that it supports efforts to leverage LIHEAP data for auto-enrollment and auto-recertification in CAP and recommends that UGI review and enhance notifications to auto-enrolled customers to address any customer confusion identified by the Commission’s Bureau of Consumer Services (“BCS”). (CAUSE-PA Comments, p. 38.)

The Company is working with its IT Department to automate the utilization of LIHEAP data. This is an ongoing process, and UGI is still working to find the most efficient way to utilize this data. Currently, reviewing the data from DHS is a very manual process. Additionally, auto-enrollment is only available to electric CAP customers per the 2023 Electric Base Rate Case Settlement. The feasibility of expanding CAP auto enrollment for gas customers will be reviewed in 2026 with the Company's USAC. UGI is only auto-recertifying now based on the existence of LIHEAP on the account.

Lastly, CAUSE-PA recognizes that additional customer education is required to ensure that auto-enrolled customers have all the information they need to be successful within the program. (CAUSE-PA Comments, p. 38.) CAUSE-PA recommends that the Commission direct UGI to work with its USAC to review and revise notifications for its auto-enrolled electric customers to help ensure they understand the program parameters and associated rights and responsibilities as program participants. (CAUSE-PA Comments, p. 39.)

The Company avers that all customers receive a Rules and Guidelines document after enrolling in CAP. Recertification letters remind customers of the program requirements and benefits. Additionally, UGI has developed a comprehensive Customer Education and Outreach Plan ("CEOP") that includes messaging with examples of the types of documents it sends to customers. Therefore, the Company does not agree with CAUSE-PA's recommendation that its notifications to auto-enrolled electric customers should be revised. However, if the Commission takes issue with the Company's current practices, UGI is willing to work with its USAC to review and update the current practices.

8. Use of LIHEAP Data Sharing

In its Comments, CAUSE-PA notes that the efficiency of the application processes for both Operation Share and LIURP can be streamlined by using LIHEAP data and data available to the

Company to eliminate duplicative income documentation requirements. (CAUSE-PA Comments, pp. 40-41.) Additionally, CAUSE-PA supports UGI's use of LIHEAP data to identify households that could benefit from CAP and other universal service programs and to further streamline and simplify the application processes. (CAUSE-PA Comments, p. 41.)

In response, UGI uses the existence of LIHEAP to prevent a customer from having to provide proof of income for LIURP and Operation Share. Paragraph 59(c) of the UGI Gas 2025 Base Rate Case Settlement states that either LIHEAP or data sharing will allow customers to avoid having to prove income; however, the Company still needs income and household composition to determine the Federal Poverty Income Guidelines level.

Moreover, CAUSE-PA recommends that automation should be utilized whenever possible to streamline the enrollment process and that the Commission direct UGI to expand the charge of this working group to include consideration of further streamlined and/or automation of enrollment for its LIURP and Operation Share programs. (CAUSE-PA Comments, p. 41.)

In response, UGI agrees that the ultimate goal remains to find efficiencies without affecting customer service. However, this does not necessarily mean automation should be used in every circumstance. UGI should be granted the discretion to determine when the use of automated or manual processes is prudent, particularly when manual processes can be used to keep costs down without adverse impacts to customer service.

CAUSE-PA also recommends that UGI work with its USAC to revise and refine both its materials and its process for disseminating these materials to its LIHEAP recipients who are not already enrolled in CAP. (CAUSE-PA Comments, p. 42.)

The Company has provided an example of its marketing efforts to LIHEAP Non-CAP recipients, as Exhibit 11 of the CEOP. Examples of the marketing efforts have been shared in a

prior USAC meeting, and UGI has not received any comments on its CEOP. The Company does not believe that any additional formal reviews are necessary.

Furthermore, OCA strongly supports proposed data sharing with DHS, in which UGI is already participating. (OCA Comments, p. 20.) OCA recommends that, if a customer wants to use their data sharing to opt into CAP through their LIHEAP application, they should be able to do that at the same time for both UGI Gas and Electric, and that a customer should not need to take two separate actions to accomplish that objective. (OCA Comments, p. 21.)

UGI disagrees with this recommendation. When a combined electric and gas customer is auto-enrolled in UGI Electric's CAP, or vice versa, the Company must speak with the customer about their service. At that time, the customer is offered the opportunity to enroll in UGI Gas's CAP as well. UGI has attempted to conduct this process separately, but prior experience shows that doing so automatically leaves the customer dissatisfied. Further, doing so on a combined bill basis would require significant IT changes, resulting in additional staffing-related costs.

Next, OCA suggests that if a customer wants to use their data sharing to opt into CAP through their LIHEAP application, they should be able to do that at the same time for both UGI Gas and UGI Electric, as opposed to having to take two separate actions in order to accomplish an objective. (OCA Comments, p. 21.) As a result, OCA suggests that UGI Gas and Electric share information, to the extent that they can, about confirmed low-income customers in order to facilitate enrollment of those customers in each of the respective programs where the utility has information that the customer is confirmed low-income and has high arrearages, shutoffs, or payment arrangements. (*Id.*) OCA recommends that UGI determine what barriers exist within the Gas and Electric divisions to facilitate easier enrollment through data sharing. (*Id.*)

UGI notes that in the APPRISE Evaluation, only two of the individuals surveyed stated that having separate systems for gas and electric was somewhat burdensome. Their comments state that it would merely be “useful to have greater access to information.” (2024 APPRISE Evaluation at 12.) UGI maintains that significant IT changes would be required and additional costs would be incurred in order to provide the information needed and achieve what is suggested in this comment by OCA.

In its Comments, OCA recommends that UGI engage in additional data sharing and address the concerns raised by the APPRISE Evaluation regarding intra-company coordination. (OCA Comments, p. 21.)

UGI notes that OCA is not clear regarding what concerns the APPRISE Evaluation raised regarding intra-company coordination. Therefore, UGI cannot respond to this recommendation until the Company receives clarity regarding the section of the APPRISE Evaluation to which OCA is referring. Regardless, there are no major differences in CAP processing between UGI Gas and UGI Electric.

9. Opt-In for Universal Service Programs

In its Comments, CAUSE-PA states that it continues to support implementing auto-enrollment and recertification procedures for its gas division so that low-income customers who are eligible for LIHEAP can seamlessly enroll in and recertify for CAP without an added administrative burden. (CAUSE-PA Comments, p. 42.)

To implement this, UGI notes that additional full-time equivalent (“FTE”) employees would be needed due to the manual nature of this process. There is no “automated” way to enroll a CAP customer currently. An auto-enrollment feature would require a system enhancement, including a COS replacement, for which the Company estimates to be approximately \$5-\$6 million, as referenced earlier. The Company also notes that Peoples Natural Gas Company LLC

(“Peoples”) had its proposal to auto-enroll customers into CAP rejected. *See Peoples Natural Gas Company LLC Universal Service and Energy Conservation Plan for 2019-2024; Petition of Peoples Natural Gas Company LLC -- to Amend 2019-2023 Universal Service and Energy Conservation Plan*, Docket Nos. M-2018-3003177, M-2020-3021343, P-2024-3052324, 2025 Pa. PUC LEXIS 140, at *17 (Order entered Apr. 24, 2025). Further, under Paragraph 59(c) of the UGI Gas 2025 Base Rate Case Settlement, the Company will be facilitating quarterly USAC meetings in 2026 to discuss the feasibility of auto-enrollment in UGI Gas’s CAP.

10. Recertification Notices

In its Comments, CAUSE-PA states it supports UGI’s elimination of reminders for participants who have already completed the recertification process and agrees that it would be confusing for consumers to receive additional notice after recertification has been completed. (CAUSE-PA Comments, p. 44.)

The Company agrees that it will attempt to eliminate reminders for customers who have already completed the recertification process.

CAUSE-PA also recommends that the Commission require UGI to retain the number and frequency of notices it currently provides to CAP customers regarding recertification requirements, including notices delivered through CBOs. (*Id.*)

Tracking all CAP customer notices would require the Company to modify its COS, which would require IT enhancements and impose additional operating costs. Currently, correspondence between customers and CBOs is not tracked; only correspondence between customers and the Company is tracked. UGI utilizes 18 CBOs who send correspondence to customers, and it would be very difficult to retain notices, as CBOs and UGI do not have a consistent system of record for retention of these notices. The Company does not believe that this recommendation would increase program participation or retention of CAP enrollments. Instead, expanding tracking requirements

to include correspondence between CBOs and customers would increase administrative burdens without providing any worthwhile benefits.

Additionally, CAUSE-PA recommends that UGI consult with its USAC to review the language in the CAP notices, determine whether its current email outreach related to recertification is sufficient, and assess whether additional electronic outreach, including SMS messages, may be implemented, provided customers have consented to such outreach. (*Id.*) CAUSE-PA further proposes that UGI work with its USAC to review and revise its process for sending these notices, along with reviewing the notices themselves, to improve response rates. (*Id.*)

Regarding USAC review, UGI notes that the CAP communication at issue was already provided as part of the CEOP as Exhibit 15. As a result, the parties to this proceeding and the USAC already can review and provide feedback on the communication. UGI maintains that further formalized review through its USAC would be duplicative and should not be required at this time. In addition, the Company believes that requiring the Company to implement a new SMS messaging system would be overly burdensome without adding material benefits to customers. As customer consent would be required to communicate over SMS messaging, the Company anticipates adoption would be low and would not justify the implementation of a new system. In the Company's experience, it is both complicated and challenging to get customers to opt in to SMS messaging. Additionally, the Company would be unable to ensure that the intended recipient receives the message. Notwithstanding, UGI already manages and discusses the various CAP communications and messaging with its USAC on a continuous basis. Further, the Company agrees to, at periodic USAC meetings, review new messaging notices and letters. However, the Company is unwilling to commit to a comprehensive review of all CAP communications at this time. Existing examples of CAP communications used by UGI can already be found in the CEOP,

which the USAC has access to, and the Company maintains that its current coordination with its USAC already ensures stakeholder input and the appropriate level of review.

11. Voluntary Removal from CAP

In its Comments, CAUSE-PA opposes UGI's use of a 12-month stay out, under which a customer who elects to be removed from CAP must wait 12 months to re-enroll in the program. (CAUSE-PA Comments, pp. 46-47.) Instead, CAUSE-PA recommends that if a customer elects to un-enroll in CAP, for whatever reason, they should be able to re-enroll at any time if they pay what would have been their CAP rate for the months they were out of the program, which CAUSE-PA claims is required under the Commission's August 2019 Order. (*Id.*) Further, CAUSE-PA recommends that the Commission direct UGI to revise its voluntary CAP removal policy to be consistent with Commission Orders under any circumstance and amend the language in its USECP accordingly. (*Id.*)

The Company maintains that enrollment in CAP should be a long-term plan, as there is an overall benefit to customers remaining at the CAP rate and maintaining enrollment in the program. Further, the CAP program is not designed as a flex rate; it is designed with the idea that customers will enroll and stay enrolled for a period of time. The Company's 12-month stay out period offers a reasonable incentive for customers to remain enrolled in CAP while also shielding the Company from the administrative burden of processing additional enrollments.

CAUSE-PA next recommends that UGI be required to affirmatively reach out to customers who were denied reenrollment in CAP since August 2019. (CAUSE-PA Comments, pp. 47-48.) CAUSE-PA argues that UGI should be required to: (1) invite all these customers to reenroll in CAP; (2) clearly identify any CAP catch-up amount needed to reapply; (3) provide enrollment instructions; and (4) offer assistance to reenroll. (*Id.*)

UGI does not believe that reaching out to all customers who have been denied re-enrollment in CAP since August 2019 would be either beneficial or practical. It is possible that some customers were re-enrolled multiple times since 2019. Additionally, this sweeping recommendation would take considerable effort, including substantial IT assistance, to pull customer logs for review just to identify the customers that would meet these criteria. Requiring the Company to additionally calculate CAP catch-up amounts for each of those customers would be an additional administrative lift. Moreover, UGI already consistently solicits customers for CAP enrollment at least twice a year. CAUSE-PA has provided no data or analysis suggesting that the Company's current method is ineffective or that their far-reaching recommendation would solicit more enrollments. Finally, pursuant to Paragraph 46 of the UGI Gas 2022 Base Rate Case Settlement, the Company has been utilizing a low-income assessment and outreach pilot program to assess, identify, and engage potential low income customers for enrollment into CAP.

12. Obligation to Participate in Other Weatherization Services

In their Comments, both CAUSE-PA and OCA argue that there should not be a program requirement to participate in LIURP or other weatherization services in order to qualify for CAP. (CAUSE-PA Comments, p. 48; OCA Comments, p. 28.) CAUSE-PA and OCA recommend that UGI amend its USECP to clarify that it does not remove a low-income household from CAP due to failure to participate in LIURP or "any other weatherization services offered through local and state weatherization agencies." (CAUSE-PA Comments, p. 48; OCA Comments, p. 29.) Overall, CAUSE-PA does not support policies that mandate participation. (CAUSE-PA Comments, p. 48.) OCA suggests that UGI not be permitted to threaten or to remove customers from CAP due to a refusal to participate in LIURP unless UGI makes available sufficient resources to deliver LIURP services to all high usage customers. (OCA Comments, pp.28-29.) Further, OCA expresses

concern that, to the extent UGI threatens to remove participants from LIURP without effect, the threat may chill potential enrollment in CAP. (OCA Comments, p. 29.)

Historically, UGI has removed only one customer for refusing to participate in LIURP. That customer had extremely high usage, which contributed to the Company's decision to remove them from the program. Additionally, UGI notes that other utilities have this requirement in their USECPs or similar materials. For example, Duquesne Light Company's ("Duquesne Light") CAP program requires that if usage significantly increases, the customer may be required to complete a smart comfort assessment (LIURP). UGI maintains that this program requirement is managed in a fair way and allows for a reasonable cost control measure. Neither OCA nor CAUSE-PA has provided compelling support for their recommendations to remove this reasonable requirement.

Further, CAUSE-PA recommends that the Commission direct UGI to amend its Proposed 2026 USECP to indicate that it will encourage and support CAP participants to pursue free weatherization services, other than LIURP, but will not require them to do so. (CAUSE-PA Comments, p. 49.)

UGI maintains that it already encourages and supports CAP participants to pursue free weatherization services other than LIURP through its CARES referrals, if applicable. CBOs also interface with customers and review the benefits of multiple programs, including other weatherization services. CBOs can help with the utilization of programs other than UGI. It is not necessary to amend the USECP for UGI to continue this practice, and the Company should not be required to do so.

For these reasons, the Commission should reject the proposals from CAUSE-PA and OCA to remove the LIURP requirement from CAP in the proposed USECP and require the Company to

amend its proposed USECP to indicate the Company's support for customers pursuing other weatherization programs.

13. LIURP and High Usage Controls

In its Comments, CAUSE-PA argues that removal from CAP is a severely punitive consequence for customers who do not participate in LIURP and must be an absolute last resort. (CAUSE-PA Comments, p. 50.) Therefore, CAUSE-PA recommends that the Company's USECP explicitly provide exemptions to the LIURP requirement in all cases where a household is unable to participate in LIURP. (*Id.*) This recommendation would include exemptions related to the condition of the home, a landlord's failure to grant permission to install measures, medical conditions of household members, or other extenuating circumstances. (*Id.*)

UGI clarifies again that it does not regularly remove customers who are unable to participate in LIURP from CAP. As stated above, to date, only one customer has been removed from CAP for non-participation in LIURP, due to extremely high usage. However, the proposed USECP does allow for the removal of customers from CAP who fail to participate in LIURP. The Company maintains that this is an important provision to preserve for use in extreme cases. The Company clarifies that it does not remove customers from CAP if they are unable to participate in LIURP due to the condition of the home, the landlord's failure to provide permission, or other extenuating circumstances. No further revisions to the proposed USECP are necessary.

14. Security Deposits

In its Comments, CAUSE-PA recommends that UGI be required to update its USECP to be consistent with Commission regulations, requiring utilities to "refund a deposit, along with any applicable interest, within 60 days upon determining that the customer or applicant from whom a deposit was collected is not subject to a deposit..." (CAUSE-PA Comments, pp. 52-53.) Further,

CAUSE-PA argues that UGI should not collect deposits from low-income verified customers pursuant to 52 Pa. Code § 56.32(e). (*Id.*)

As noted in the Company's Responses to Requests for Supplemental Information, UGI is not collecting deposits from low-income verified customers, and upon income verification, any previously fully or partially paid deposits are automatically refunded to the customer, with any accrued interest, by the customer's billing system. In accordance with the Settlement reached in UGI Gas's 2025 Base Rate Case, UGI Gas's tariff was amended to specify the process for refunding deposits to confirmed low-income customers. As such, UGI maintains that its current processes for assessing and refunding security deposits comply with the Commission's regulations and that further revision of the proposed USECP is unnecessary.

In addition, CAUSE-PA recommends that UGI consult with its USAC regarding any customer-facing materials or notices developed in conjunction with this provision and report on the number of deposits returned at each convening. (CAUSE-PA Comments, p. 53.) UGI agrees with this recommendation and can report that changes to the communications referenced by CAUSE-PA have already been made and are part of the USAC review.

In its Comments, OCA also expressed concerns about UGI's application of security deposits to low-income customers, focusing on the settlement language reached in the 2025 Gas Base Rate Case. (OCA Comments, p. 22.) Specifically, OCA raised concerns that the revised tariff language in Paragraph 65 of the Settlement, related to security deposit refunds, is unclear and overly restrictive. (OCA Comments, p. 24.) The revised tariff language referenced by OCA was reached through compromise in the context of a Settlement to which OCA is a signatory. Adopting OCA's recommendations to amend or "clarify" this tariff language now, within months of the adoption of the Settlement, would be inappropriate, especially considering that the other parties to

the Settlement (with the exception of CAUSE-PA) are not parties to the instant proceeding. UGI maintains that the Settlement provisions, as signed onto by OCA and approved by the Commission, are fully compliant with the applicable regulations and should not be disturbed.

15. CAP Final Billing

In its Comments, CAUSE-PA argues that it is unclear whether UGI's final billing policy for CAP customers complies with Commission Guidance, as it is not specifically addressed in UGI's Proposed 2026-2030 USECP. (CAUSE-PA Comments, p. 53.) CAUSE-PA also recommends that UGI apply the following steps in calculating a final bill because it is currently unclear what rate UGI applies to final CAP billing: (1) determine the prorated PIP for the final billing month, (2) determine the bill based on actual usage for the final billing month, (3) for minimum bill customers, determine the prorated daily minimum bill rate for the final billing month, and (4) charge the lesser of the actual bill, the daily prorated CAP bill, or (if applicable) the daily prorated minimum bill for the number of days service was connected during the final billing cycle. (CAUSE-PA Comments, p. 54.)

The Company does not agree with CAUSE-PA's recommendations. Currently, CAP customers are issued final bills that include the entire amount due on the account balance. This means that for the final period, pre-program arrears that have not been paid off are included in the final bill, and the Company does not preemptively apply arrearage forgiveness to the final bill. The Company maintains that this practice is consistent with Commission guidance, as the CAP Final Billing Methods Order cited by CAUSE-PA does not require utilities to grant pre-program arrearage forgiveness before a customer payment is received. Moreover, the Commission recognized that "[t]here was no clear consensus among the energy utilities and other stakeholders for whether to proceed at this time with a standardized policy regarding CAP final bills" and, therefore, did not implement any formal guidance on how utilities must carry out final billing for

CAP customers.² As such, the Company's final billing practice provides CAP customers with the CAP rate for their final usage while also appropriately holding those customers responsible for the utility service provided.

16. CAP Credit Expenditures

In its Comments, CAUSE-PA recommends that the high-usage LIURP threshold currently used to provide focused efficiency services to reduce CAP costs should be determined separately from the high-usage threshold used to calculate any maximum credit threshold. (CAUSE-PA Comments, pp. 56-57.) CAUSE-PA also opposes the imposition of punitive maximum CAP credit limits for UGI Electric CAP customers and agrees with UGI that the relative benefit to other ratepayers does not justify the substantial harm, claiming that doing so is arbitrary and capricious, and serves to compound harms associated with energy insecurity. (CAUSE-PA Comments, p. 58.)

UGI does not have a maximum CAP credit in effect. Further, there is no plan to implement maximum CAP credits for UGI Electric or UGI Gas. Currently, there are two high usage criteria in place: (1) the high-usage LIURP criteria of 877 ccf for UGI Gas, 12,788 kWh for UGI Electric heating customers, and 6,000 kWh for UGI Electric general customers; and (2) the high-usage CAP criteria for UGI Gas of 1,787 ccf and for UGI Electric of 32,632 kWh. If the Commission were to impose maximum CAP credit limits, UGI would use the CAP high-usage thresholds (1,787 ccf for gas and 32,632 kWh for electric, annually) to reduce or eliminate their impact.

Third, CAUSE-PA suggests an alternative to imposing max CAP limits. (CAUSE-PA Comments, p. 65.) Instead of imposing maximum CAP limits, which could result in significant numbers of low-income households losing essential services to their homes, CAUSE-PA

² *Staff Review of Customer Assistance Program (CAP) Final Billing Methods*, Docket No. M-2019-3010190, (Order entered March 12, 2020).

recommends addressing the underlying causes of unaffordability while allowing customers to maintain affordable CAP rates. (*Id.*)

UGI disagrees with this recommendation and believes that there is no need to follow this alternative to imposing maximum CAP limits, as UGI currently does not have a maximum CAP credit in effect.

In its Comments, OCA also raises numerous concerns regarding CAP credit expenditures, recommending a number of measures that it claims could be implemented to control costs as an alternative to imposing maximum CAP limits. (*See* OCA Comments, pp. 8-19.) As previously stated, the Company has not proposed to implement maximum CAP credits and does not plan to do so unless directed by the Company. OCA's numerous recommendations are far reaching, highly prescriptive, based on assumptions that are unsupported by data or analysis, and conditioned on specific circumstances that may not come to pass. Requiring the Company to implement these recommendations would result in significant administrative burdens and increased costs for the Company, including costs related to implementing the IT changes that would be necessary and training and/or hiring additional employees to carry out the suggested program and administrative changes. In addition, many of these suggestions would impose additional burdens and restrictions that are not required by any of the Commission's regulations or orders. As such, UGI is opposed to these restrictive recommendations and maintains that, to the extent the Commission directs the Company to control costs or impose maximum CAP credits, the Company should be afforded basic managerial discretion to determine the most effective and efficient way to comply with the Commission's directives and implement program changes to control costs. Thus, the Commission should reject the OCA's cost controlling recommendations contained on pages 8 through 19 of its Comments.

17. High Usage Thresholds

In its Comments, CAUSE-PA supports a proposal to lower the Company's LIURP high-usage threshold to allow more eligible households. (CAUSE-PA Comments, p. 67.)

To clarify, UGI did not propose to lower its LIURP high-usage threshold. Rather, the Company lowered its CAP high-usage threshold. As such, the Company's LIURP high usage threshold remains unchanged in the proposed USECP.

In addition, CAUSE-PA expresses concern that if the Commission were to impose a maximum CAP credit policy, UGI's reduction in its high usage threshold for the purposes of providing targeted energy education and LIURP services could compound the negative impacts of a maximum CAP credit threshold. (CAUSE-PA Comments, pp. 67-68.)

CAUSE-PA's hypothetical concern, should CAP credit maximums be imposed, is unsupported by any analysis or data. Moreover, imposing a maximum CAP credit would not impact customers' eligibility for LIURP benefits. As such, CAUSE-PA's concerns regarding "compounded" impacts of a maximum CAP credit threshold on LIURP services should be disregarded.

In addition, CAUSE-PA states that it is concerned that a flat usage threshold may cause UGI to miss smaller homes with an opportunity for substantial usage reduction through LIURP, and may favor homes for LIURP services in northern counties within UGI's broad service territory. (CAUSE-PA Comments, p. 68.) CAUSE-PA provides no support or analysis to support this concern. As a result, CAUSE-PA recommends establishing a tiered high-usage threshold by square footage, claiming that it would better allow UGI to meet the need for usage-reduction services across its service territory. (*Id.*)

UGI disagrees with this recommendation. The Company currently does not capture household square footage until a customer begins the LIURP process and an Energy Audit is

conducted, thus UGI would not know the square footage of a customer's premise in advance of a customer participating in the program. Supplemental IT programming would be required to incorporate household square footage into UGI's customer database and could potentially lead to customer, CBO, and contractor confusion as it would needlessly complicate program enrollment criteria. It would be extremely difficult to implement this recommendation from an administrative standpoint. Further, no other program is currently held to that same standard. Considering the administrative difficulties this recommendation would impose and the uncertainty that it would result in any realized benefit, the Commission should reject this recommendation.

Moreover, CAUSE-PA asserts that UGI's flat usage threshold does not account for regional variations in weather, which may create regional disparities in access to usage reduction services; it recommends that a tiered high usage threshold could also be a solution to help reduce regional differences in the delivery of services. (CAUSE-PA Comments, pp. 68-69.)

As noted above, it would likely be extremely difficult to implement a tiered high usage threshold from an administrative standpoint. Further, UGI is not aware of any other utility program being required to account for regional variations in weather in its administration. Additionally, implementing this suggestion would likely be very confusing to contractors, CBOs, and customers. Nothing in statutes or policy statements requires utilities to be held to this standard. UGI maintains that it is within its discretion to manage programs; running programs relating to daily changes in weather is not something it is able to do. Supplemental IT programming would be required to incorporate regional variances in weather and customer household location. Considering the administrative difficulties in administering its LIURP program based on region and weather patterns, CAUSE-PA's tiered usage threshold recommendations should be rejected.

18. CAP Assistance and Continuation of Operations

In its Comments, CAUSE-PA recommends that the Commission direct UGI to provide further information regarding procedures for ensuring that UGI's low-income customers can access assistance through CBOs. (CAUSE-PA Comments, p. 70.)

To clarify, the issue raised in the APPRISE Evaluation report summarized a concern from one agency regarding customers seeking information about a pending termination notice. As stated in the APPRISE report:

An agency reported that there is back-and-forth communication between the CBOs and the UGI call center when a customer asks for assistance with a shut-off notice. The call center directs customers to their CBO to assist with shut-offs, while the CBO directs customers to contact UGI.

In instances where shut off notices are issued or service has been terminated, the customer's first contact point should be with the Company. The termination notice comes from the Company, so customers should contact the Company to determine how to reconnect or avoid termination. Then, the customer will be able to contact the CBO and access additional assistance, as needed.

CAUSE-PA also recommends that the Commission direct UGI to streamline its procedures for issuing an Operation Share grant when a customer's service has already been terminated, including by creating channels of communication with CBOs to allow quick review to determine whether a grant, with or without an additional customer payment, is sufficient to restore service. (*Id.*)

UGI disagrees with this recommendation and believes that its implementation would require an IT enhancement and lead to additional costs. Currently, a customer must be active in order to process an Operation Share grant. The customer must contact UGI to determine what the restoration amount is and then review options. CBOs do not have this level of detail.

Next, CAUSE-PA recommends that UGI provide, at a minimum, twice-yearly training and education for all CBOs it partners with, as well as for internal call center staff, call centers, and/or intake staff employed by UGI. (CAUSE-PA Comments, p. 71.)

Currently, UGI provides training to agencies during onboarding, and additional training is provided upon request or as needed when determined by the Company. UGI is open to considering additional training, but because of the large number of CBOs, this would be an administrative burden. UGI would need to confirm the training protocol for the call center staff and would need a dedicated FTE outreach trainer to meet the twice-a-year directive. The CBOs understand UGI's programs, and there is no indication that additional training is needed. If there are policy changes, the Company meets with CBOs to provide updates. The Commission does not have the authority to direct UGI when or how often it can train employees or agencies. UGI will conduct additional USAC meetings in 2026, where CBOs will also be in attendance to hear about program trends and regulatory updates.

In its Comments, OCA also addresses CAP assistance and the continuation of operations, suggesting that UGI be required to provide greater detail on the process changes implemented to ensure that CAP customers can receive assistance either by contacting UGI or the CAP agency, and on how those changes resulted in the resolution of certain issues identified in the 2024 APPRISE Evaluation. (OCA Comments, pp. 30-31.) OCA recommends that UGI be directed to adopt APPRISE's recommendation to develop "clear procedures to address contacts from customers at risk of service termination and train customer service representatives and CAP agency staff on these procedures." (OCA Comments, p. 31.) Further, OCA recommends that this be expanded to include coordination between UGI Gas, UGI Electric, and the CBOs. (*Id.*)

UGI agrees with this recommendation and maintains that Customer Service Representative (“CSRs”) training is part of the UGI Gas 2025 Base Rate Case Settlement. In addition, the Company has clear procedures in place with the call center representatives and CBOs. Customers are encouraged to contact the Company if they have a termination notice or are terminated. This information is included in the various notices customers receive when they are in danger of termination. Company representatives must review the account options with the customer, which is outside the scope of the contracted work CBOs perform on behalf of UGI. Call center representatives review all options with the customer, which may include enrollment in CAP. However, CAP is not always the customer’s chosen path.

OCA also claims that there are separate enrollment requirements for enrollment into CAP for UGI Gas and Electric. (OCA Comments, p. 30.)

OCA is mistaken. UGI does not have separate requirements for enrollment into CAP for its gas and electric customers, with the exception that, in accordance with Paragraph 60(d) of the 2023 UGI Electric Base Rate Case Settlement, certain electric customers that meet specific specifications are automatically enrolled in CAP. Otherwise, the requirements for a customer to enroll gas and electric accounts into CAP are identical. As such, OCA’s additional concerns regarding separate CAP enrollment requirements are unfounded.

19. Customer Education and Outreach Plan

In its Comments, CAUSE-PA states that it does not oppose UGI’s Customer Outreach and Engagement Plan as written, but supports inclusion of additional targeted outreach and tracking of the impacts of its outreach. (CAUSE-PA p. 71.)

UGI responds that additional targeted outreach and tracking of the impacts of its outreach will result in incremental operating expenses to its Customer Outreach and Engagement Plan.

However, UGI does not currently have any rate recoverable mechanisms for these types of additional marketing efforts.

In its Comments on UGI's CEOP, OCA recommends that the findings of the APPRISE Evaluation be incorporated into the Company's CEOP as set forth, specifically, that participation in CAP resulted in a reduction in disconnection orders and in collection activities, which should result in a reduction in collection costs. (OCA Comments, pp. 31-32.)

The Company maintains that these efforts are listed in UGI's CEOP. Some of the APPRISE recommendations that the Company is considering incorporating include assessing how to compensate agencies for mailing letters to customers solicited for CAP participation, how to provide tailored services to customers who need additional support (*e.g.*, food or child care assistance), and whether the LIURP health and safety allowance should be increased for very high usage customers who could achieve high energy savings if those issues were remediated.

OCA lists various statistics from the APPRISE Evaluation and recommends that the information should be considered as part of UGI's development of a CEOP. (OCA Comments, p. 32.)

UGI maintains that there is no cost recovery for CAP advertising and marketing expenses; therefore, UGI requires additional operating expenses if they are not recoverable. The Company maintains that the level of marketing to non-CAP customers is sufficient and cites the 2023 APPRISE Evaluation, where it states, "UGI has significantly increased their CAP marketing efforts." The Evaluation further details the list of marketing efforts the Company has undertaken. In addition, the CEOP contains various examples of marketing efforts to encourage customers to enroll in CAP, including the landing page (Exhibit 21) utilized during the Low Income Assessment

Pilot, which targeted over 100,000 non-CAP customers, using email, direct mail, and digital advertising.

OCA avers that UGI does not address or reference how to increase outreach or awareness of CAP. (OCA Comments, p. 33.)

UGI maintains that these efforts are further addressed and explained in the Low Income Assessment Pilot required under Paragraph 61(a) of the 2025 UGI Gas Base Rate Case Settlement, as well as the Company's CEOP.

OCA avers that the observations included in the two items immediately above are the basis for the development of a plan to address the information gaps for applicants and CAP customers and how to reduce the numbers identified in the Evaluation. (OCA Comments, pp. 32-33.)

UGI's CEOP employs various methods to address information gaps for applicants and CAP customers. At the same time, the ability and willingness of customers to read and follow up on the information they are given vary to some extent. The CEOP includes resources for customers that are available in Spanish, for example, Exhibit 9 – USP Brochure, Exhibit 17 – CAP Video, and Exhibit 18 – Operation Share Bill Insert. The Company also has a Spanish-language CAP application available. In addition, the Company's Low Income Assessment Pilot consisted of a targeted campaign to over 100,000 income-verified and self-certified low-income customers, which provided a landing page to determine eligibility for CAP. The campaign also included a series of postcards mailed through USPS, plus a series of emails to the target audience. UGI maintains that it has a limited ability to fund this suggestion and would require full and total cost recovery for translation services for all languages.

OCA recommends that customer knowledge issues identified in the APPRISE Evaluation be addressed as part of UGI's CEOP. (OCA Comments, p. 33.)

In response to this suggestion, UGI is willing to modify its CAP letters to include information about other programs available through agencies.

OCA also recommends that UGI's CEOP document UGI's plans to target confirmed low-income customers to get them enrolled in CAP. (*Id.*)

UGI's CEOP includes information about CAP solicitation efforts. It contains standard language referring to CEOP that can be used for multiple items. If more is required of UGI, the Company would need to receive full and current cost recovery, which would further increase the USP Rider and the cost to customers.

Additionally, OCA recommends that UGI Gas provide a standalone written communication to confirmed low-income customers prior to disconnection, informing the customer of the availability of CAP and of the availability of arrearage forgiveness. (OCA Comments, pp. 33-34.)

Here, Paragraph 67 of the UGI Gas 2025 Base Rate Case Settlement already requires the Company to "update current customer dunning communications and credit call center scripts to clearly inform customers of their option to enroll in CAP if they qualify, what is required for enrollment, and the ability to have arrearage forgiveness under CAP." Further, UGI commits to adding the information to its 10-day notices, soft notices, and door hangers.

OCA suggests that UGI Gas adopt a procedure, developed in collaboration with its Universal Service Advisory Group ("USAG"), under which it would seek to make personal contact with the customer subject to disconnection. (OCA Comments, p. 34.) OCA argues that UGI Gas should offer the confirmed low-income customer the opportunity to apply for its CAP and arrearage forgiveness program and that if the customer expresses a desire to make such an

application, UGI Gas should postpone the disconnection for a reasonable period of time to allow the application process to be completed. (*Id.*)

Paragraph 84 of the UGI Gas 2025 Base Rate Case Settlement addresses this concern. That provision provides that “UGI Gas will develop additional training materials for its field representatives by April 1, 2026, regarding making personal contact with customers prior to termination and will incorporate these materials into the training of its field representatives,” and that “UGI Gas will consult with stakeholders for input related to the training materials and incorporate agreed-upon modifications.” OCA’s recommendation unnecessarily overlaps with this existing commitment, which already requires the Company to develop the procedures it recommends. As such, this recommendation should be rejected.

OCA suggests that, before UGI Gas enters into a deferred payment arrangement with a customer which the Company either (1) knows to be a Confirmed Low-Income customer; or (2) has generated information through the deferred payment arrangement (“DPA”) process documenting that the customer is in the Tier 1 income range (at or below 150% FPL), it should be required to provide the customer a stand-alone Plain Language notice to that customer of the customer’s right to enter into CAP and an explanation of the advantages of CAP’s arrearage forgiveness benefits. UGI Gas should develop this Plain language notice in collaboration with its USAG. (*Id.*)

UGI observes that Paragraph 67(c) of the UGI Gas 2025 Base Rate Case Settlement Agreement states that any customer with a past due payment will receive a soft letter with plain language stating the option to enroll in CAP and have debt forgiveness, as well as instructions on how to enroll. Customers will not receive a payment arrangement without receiving that letter. This also includes updating call center scripts to notify customers of the option to enroll in CAP.

Thus, OCA's recommendation can be addressed through the written communication being developed by UGI.

The additional items OCA suggests would incur additional costs not included in the USECP or UGI's budget. To the extent any of these get accepted, the Company would require full and current cost recovery through the USP Rider; otherwise, those costs would have to be recovered through the Company's base rates. Further, UGI believes that these measures will not provide customers with additional protection measures than what is already in place. Instead, if these measures are approved, they will incur additional expenses, IT enhancements, and administrative tasks, without providing a meaningful improvement to the customer's experience. Lastly, UGI has already submitted its CEOP and must wait to see what occurs regarding that before additional communications and outreach efforts are added.

OCA suggests that UGI Gas be allowed to require a confirmed low-income customer to pay off arrearages through a payment arrangement only with the customer's informed consent. (OCA Comments, p. 34.)

However, Paragraph 87 of the UGI Gas 2025 Base Rate Case Settlement states, "UGI Gas agrees to develop and implement a written communication to confirm the terms of initial and substantially modified payment agreements upon conclusion of a customer's oral agreement to terms." Paragraph 87 further states that this written communication "will be implemented by April 1, 2026." Thus, OCA's recommendation can be addressed through the written communication being developed by UGI.

OCA also suggests that UGI Gas should explain how enrolling in CAP and making the customer's arrearage subject to arrearage forgiveness "would impact the customer's monthly bill" relative to a customer's decision to enter into a DPA. (*Id.*)

However, Paragraph 67(c) of the UGI Gas 2025 Base Rate Case Settlement states that CSR scripts will be modified to explain how this would impact customers. Therefore, this recommendation is unnecessary.

In addition, OCA proposes that when confirmed low-income customers accrue an unpaid balance of \$500, UGI Gas should provide a stand-alone written Plain Language notice informing these customers of their right to enroll in the Company's CAP, along with an explanation of the advantages of CAP's arrearage forgiveness provisions. (OCA Comments, p. 35.)

UGI maintains that this additional notice would require IT programming and is not needed based on the communications set forth in the CEOP.

Also, OCA recommends that UGI look to the federal Fair Housing Act ("FHA") requirements standard and be directed to comply with the FHA's limited English proficiency ("LEP") guidelines as they relate to providing translations of "vital documents." (*Id.*)

UGI complies with the relevant regulation, and the FHA is not applicable because: (1) UGI is not subject to it; and (2) the Commission does not have jurisdiction to interpret and enforce it. UGI does not have the capacity to attempt to comply with additional laws that do not apply to it. Regardless, UGI does not discriminate when awarding customers' enrollment in USPs. Approximately 5% of UGI's customer base are Spanish speakers. Further, UGI's 2016 Base Rate Case Settlement Agreement includes provisions regarding translation requirements for customer-facing documents. Specifically, Paragraph 57 of the UGI Gas 2016 Base Rate Case Settlement required the Company to translate LIURP and Operation Share program documents into Spanish and required the Company's CBOs to have access to Spanish language interpretation services if 5% or more of the residents in the portion of the territory served by the CBO speak Spanish. Given

this prior commitment, UGI does not believe additional requirements related to the translation of USECP documents are necessary.

OCA also recommends that UGI be directed to prepare and include in its CEOP, within six months of a final order in this proceeding, an inventory of non-English languages spoken by 1,000 or more persons in the service territory. (OCA Comments, pp. 35-36.) Additionally, OCA suggests that, in consultation with interested stakeholders, including OCA and CAUSE-PA, state immigration officials, immigration advocacy groups, and other stakeholders who express an interest in participating, UGI should identify and maintain on an annual basis a list of important documents that should be translated into these non-English languages. (OCA Comments, p. 36.) UGI should then have dedicated webpages made available on the Company's website and through the Company's Interactive Voice Response system, enabling persons to access these translated documents. (*Id.*)

UGI believes that these suggestions are addressed in its CEOP. UGI agrees that it is important to have translated resources available for non-English speaking customers. The Company complies with existing obligations under the Commission's regulations and the 2016 Base Rate Case settlement to have certain documents translated into Spanish and comply with the 5% threshold. The Company does not agree that the added level of granularity outlined by advocates is necessary or beneficial, nor does the Company agree to complete an inventory of all languages spoken by 1,000 or more persons within its service territory. As noted above, the Company has outlined documents that are available in Spanish in the CEOP, the Company's website is available entirely in Spanish, and the Company has interpreters available for non-English speaking customers who contact the Contact Center. Further requirements would be overly burdensome considering the resources already available to customers.

OCA proposes that the Company factor into its CEOP greater outreach to customers about CAP at the time that customers apply for service and when customers move. (*Id.*)

The Company maintains that this recommendation is already covered as part of the welcome packet process contained in the Company's CEOP. In addition, in Paragraph 45 of the Company's 2022 Gas Base Rate Case Settlement, the Company committed to adding information related to USECP programs into the new customer welcome packet. As such, the Company's existing materials already satisfy the OCA's recommendation. More specifically, when a customer calls to request service at a new address or as a new customer, UGI will conduct a credit check. If the credit check fails, the customer will be given a security deposit quote. If the customer states that they are unable to pay the security deposit or are considered low-income, the customer will get a deposit waiver letter. A customer's income is gathered during credit calls, but not during move-ins. Credit calls are conducted if the customer is past due on payment or there is a shut-off notice. Further, UGI will be modifying the deposit waiver letter as part of the UGI Gas 2025 Base Rate Case Settlement, Paragraph 65(a).

OCA further recommends that an approach similar to the one proposed by OCA witness Colton in Columbia's 2025 Base Rate Case proceeding be integrated into UGI's USECP and that UGI improve screening of applicants for service at the time of the application and when a customer moves service. The recommendation was that Columbia develop a script for screening new customers for low-income status in consultation with its USAC. (OCA Comments, pp. 36-37.)

The Company disagrees with this far-reaching recommendation, which would require the Company to perform routine income screening of all customers on all non-emergency calls. Asking customers for their income information during virtually every contact with the Company could be perceived as intrusive, particularly because this recommendation does not include any

limits, such as allowing customers to opt out of sharing income information or a time limit on the frequency of such inquiries. Moreover, this screening would increase call times and would require the Company to hire additional staff in order to maintain current call center performance metrics. OCA has included no analysis or calculation of the additional call times, personnel resources, or administrative efforts that implementing this recommendation would require. As such, the OCA's recommendation should be rejected.

OCA recommends that UGI's CEOP be modified to address the APPRISE Evaluation concerns and develop Plain Language written notices as part of the CEOP, to improve language access and screening efforts for applicants for service and customers who move. (OCA Comments, pp. 37-38.)

UGI notes that its CEOP includes Spanish-language notices and other measures that improve language access and align with the APPRISE recommendations.

20. Customer Education and Outreach Plan Initiatives

In its Comments, CAUSE-PA notes that UGI's CEOP should be amended to fully incorporate the outreach and education provisions agreed to in the Commission-approved 2025 Base Rate Case Settlement. (CAUSE-PA Comments, p. 73.)

UGI agrees with this comment and will work to amend its CEOP to fully incorporate the outreach and education provisions agreed to in the Commission-approved 2025 Base Rate Case Settlement.

CAUSE-PA also recommends that the Commission direct UGI to expand its CEOP to include explicit activities and engagement with landlords and tenants to help increase its LIURP uptake in tenant-occupied households. (CAUSE-PA Comments, p. 74.)

In response, if the tenant's name is on the account, they are already included in targeted LIURP outreach. UGI is unwilling to commit to the additional outreach recommended by CAUSE-

PA at this time. CAUSE-PA's recommendation would require the Company to develop new communications and processes for its distribution and undertake corresponding training and administration of these efforts. CAUSE-PA has provided no analysis or data to support this recommendation, and UGI maintains that, considering the additional administrative burden it poses, without a more defined and clear resulting benefit, the recommendation should be rejected.

In addition, CAUSE-PA recommends that UGI implement an outreach plan for landlords in consultation with its USAC. (CAUSE-PA Comments, p. 74.) CAUSE-PA states that this outreach and education should include engagement with local landlord associations, housing providers, and public housing authorities related to LIURP and weatherization services. (CAUSE-PA Comments, p. 74.)

UGI's Energy Efficiency and Conservation Plan ("EE&C") team has worked with similar agencies but has not seen results or progress of substance from these additional interactions. Also, additional costs, coordination, and meetings are required to get stakeholders to the table, with minimal customer benefit expected.

Lastly, CAUSE-PA recommends targeted outreach to tenants related to the host of universal service programs for which they are eligible, which could be accomplished through community trainings and targeted outreach materials. (CAUSE PA Comments, p. 74.)

However, if the account is in the tenant's name, the tenant is already receiving USP messaging. While the Company has not utilized the Rehabilitation Program funding in prior years since projects did not materialize, the funding allocated for the Rehabilitation Program was not unspent, as it was utilized for general weatherization measures within the LIURP.

21. Additional CAP Credit Issues

First, in its Comments, OCA raises concerns that, while UGI provides a CAP credit rather than just an arrearage credit, the CAP credit toward current bills is not applied unless and until a customer makes a complete payment toward their CAP bill. (OCA Comments, p. 52.)

In response, UGI's system is configured to apply pre-program arrears ("PPA") and Bill Credits only when payment is made in full for the CAP payment. For example, if a customer owes \$50 for a CAP payment, they will pay \$10 per month for five months. In the fifth month, the bill credit and PPA adjustments would be applied to the account. The Company does not see the reason why the timing of the credit matters, unless it violates a regulation. Unless there are regulatory adherence issues, UGI is not willing to make this change at this time, as doing so would require major IT re-configuration and would likely lead to increased customer confusion.

Second, OCA explains that in the Proposed 2026-2030 USECP, UGI provides that it does provide a CAP credit, not just an arrearage forgiveness credit. (*Id.*) However, the CAP credit is applied toward current bills only when a customer makes a complete payment toward their CAP bill. OCA does not believe that CAP credits should be contingent upon a customer making a payment. (*Id.*) Under these circumstances, OCA requests that UGI clarify its process by answering the following questions: what would a customer owe if (1) the customer is removed from CAP or (2) if they have their service disconnected (*i.e.*, would the customer owe their CAP bills, or would they owe their entire bill with no CAP credit applied)? (*Id.*)

At this time, the customer would owe the entire bill without the forgiveness credits applied. As outlined above, the Company is reviewing options to implement having forgiveness applied for the "pre-final" bill and then would issue a final bill on the new non-CAP rate. If the customer was disconnected for nonpayment and is enrolled in CAP, and it's within 109 days of disconnection,

the customer would be required to pay the missed CAP payments, upon which time the applicable bill forgiveness and PPA credits would be applied.

Third, OCA believes that the CAP participant's bill should be the CAP bill (*i.e.*, the standard bill minus the CAP credit). CAP credits should be applied to each monthly bill regardless of the customer's payments, not retroactively, only if or when the customer makes a full payment. (*Id.*) Additionally, OCA opposes making CAP credits contingent upon payments at all. (OCA Comments, p. 53.)

CAP bill credits, the difference between the billed usage amount and the CAP payment, are applied the month following the complete payment. However, the customer is still responsible for only the CAP payment, irrespective of the amount of the billed usage amount, so application of the bill credit being applied at a later date is not harmful to the customer.

Fourth, OCA suggests that, in the alternative to not making CAP credits contingent upon payments at all, customers should receive a CAP credit upon each complete payment, whether or not that payment is timely. (*Id.*)

Both PPA and bill credits are applied after the full payment posts, whether the payment is made on time or not. Therefore, OCA's recommendation is unnecessary due to the Company's current, existing practice.

Fifth, OCA opposes the process of reinstatement if UGI's reference to "or full balance" on page 26 of the Proposed 2026-2030 USECP means that someone has lost their CAP credit due to nonpayment. (*Id.*)

The section of UGI's Proposed 2026-2030 USECP that OCA is referencing does not mean that someone will lose their entire CAP credit and forgiveness due to nonpayment. If a customer is on month 30 of CAP and is removed for nonpayment, the customer will get the PPA and bill

credit forgiveness for every payment they made. If that customer has made 20 payments out of the 30 months enrolled in CAP, PPA, and bill credit forgiveness would be granted for the 20 payments, but not the remaining 10 payments. This same example applies to reinstatement into CAP, where missed CAP payments are required to be reinstated into the program.

Lastly, OCA requests that UGI clarify its process and, to the extent that the OCA's understanding of the process by which CAP credits are applied, recommends that the Company's application of CAP credits should be modified. (*Id.*)

To summarize, Section J of the proposed USECP states: "UGI forgives a CAP customer's pre-program arrearage balance on a one-thirty-sixth (1/36th) basis upon receipt of each timely and in-full CAP monthly payment. This practice provides immediate incentive for a CAP customer to continue the positive payment behavior. UGI also provides no less than a \$10.00 per month pre-program arrearage forgiveness. UGI applies arrearage forgiveness for each timely and in-full monthly payment, regardless of arrears, and retroactively for any months missed once those months are paid."

B. LIURP

1. LIURP Eligibility Criteria

In its Comments, CAUSE-PA supports UGI's commitment to update its LIURP eligibility language as part of the Company's USECP Compliance filing to correct the inadvertent exclusion of customers at or below 150% of the FPIG. (CAUSE-PA Comments, pp. 79-80.) CAUSE-PA also supports UGI's commitment to include a definition of "special needs customer" in its USECP Compliance filing. (CAUSE-PA Comments, p. 79.) In addition, CAUSE-PA recommends that UGI: (1) include in its definition of "special needs customers" all additional criteria "delineated in the Revised LIURP Regulations"; and (2) be required to "track and report on various LIURP data by tier – separately indicating data for special needs households." (CAUSE-PA Comments, p. 80.)

The Company agrees with CAUSE-PA's recommendation to include the specific categories of "special needs customers" contained in the Commission's revised LIURP regulations, including households with a household member or members who are age 62 and over or age five and under, have a disability, or are a victim of domestic violence. The Company also agrees to build flexibility into its definition by stating that its list is not exhaustive.

However, the Company cannot commit to tracking its LIURP data by FPIG tier and separately indicating data for special needs households at this time. This recommendation would require significant IT enhancement and an extensive overhaul of how FPIG data is currently tracked and recorded by the Company. The Commission declined to adopt CAUSE-PA's similar recommendation to impose additional reporting disaggregation for LIURP costs in the pending LIURP rulemaking proceeding, finding that "requiring public utilities to report LIURP costs in subcategories may not provide significant benefits and increase administrative burdens." (Final Rulemaking Order, p. 269.) CAUSE-PA's instant request to disaggregate LIURP data based on FPIG tier is similarly burdensome and also not likely to produce significant benefits justifying the additional costs of reporting. Thus, UGI believes that the Commission should reject CAUSE-PA's additional reporting recommendation.

2. Impact of Pending Regulations

OCA raises concerns that UGI's proposed USECP "does not contain any information regarding whether the Plan is consistent with the revised LIURP regulations" pending at Docket No. L-2016-2557886. (OCA Comments, p. 47.) As a result, OCA recommends that UGI be required to: (1) complete an issue-by-issue review of whether the Company's LIURP provisions comply with the pending LIURP regulations; (2) present that compliance review to the Commission; and (3) provide parties the opportunity to comment on whether the LIURP provisions of the USECP are consistent with the pending LIURP regulations. (OCA Comments, p. 48.)

OCA's recommendations are premature. UGI has committed to complying with any final regulations lawfully adopted and promulgated pursuant to the pending rulemaking proceeding at Docket No. L-206-2557886. Contrary to OCA's characterizations, the revised LIURP regulations, as proposed in the Commission's Final Rulemaking Order, have not yet been lawfully adopted. Requiring the Company to undergo a thorough compliance review for regulations before they take effect would be inappropriate and premature. UGI does not wish to prejudge the outcome of the regulatory process. As such, OCA's recommendations should be denied.

3. LIURP Eligibility – Exceptions

In its Comments, CAUSE-PA agrees that UGI should maintain flexibility in providing exceptions to its seven-year stay out provision for weatherization services. (CAUSE-PA Comments, p. 81.) However, CAUSE-PA recommends that UGI explicitly include its stated exceptions to its seven-year stay-out provision: (1) customer satisfaction and quality of work performed; (2) homes whose usage remains above the threshold level even after services have been provided; and (3) homes that could benefit from the delivery of coordinated services across related programs, such as Whole Home Repairs and the Weatherization Assistance Program. (CAUSE-PA Comments, p. 81.)

The Company already provides exceptions for customers who are unsatisfied with the quality of the work performed and agrees to incorporate that language into its USECP Compliance filing. However, UGI disagrees with CAUSE-PA's recommendation to explicitly include exceptions for customers whose usage remains above the threshold after measures are installed and to homes that "could" benefit from coordination with other weatherization programs. Unlike the exception for customers who are unsatisfied with previously installed measures, these exceptions would impose additional tracking and coordination requirements without ensuring corresponding benefits. There are many reasons why a home's usage may remain above the

threshold level even after weatherization services are installed, and there are limits to the usage reductions that the Company can provide. Simply because a home continues to have high usage after participating in LIURP does not mean that additional weatherization measures will be effective. Similarly, UGI cannot control the timing of when customers may take advantage of one or more of its weatherization programs. Providing customers an explicit exception to the seven-year stay out provision because they enroll in another weatherization program could be unnecessarily duplicative and may not achieve additional savings.

In addition, CAUSE-PA recommends that UGI be required to “track exceptions made, exceptions requested but denied, and the reasons for such” and, depending on the data received, amend its USECP to add additional exceptions to its seven-year stay out provision. (CAUSE-PA Comments, p. 81.) The Company is willing to commit to tracking exceptions as recommended by CAUSE-PA. However, to the extent this recommendation would impose an additional reporting requirement, the Company maintains that tracking the exceptions internally is sufficient and does not agree to submitting a separate report containing this data.

4. Energy Conservation Kits

In its Comments, CAUSE-PA supports discontinuing energy conservation kits and questions the effectiveness of the Company’s alternative provision of energy education packets upon customer request. (CAUSE-PA Comments, p. 82.) As a result, CAUSE-PA recommends that the Company be required to “monitor accounts that have received education packets for any subsequent reduction in usage and/or enrollment in universal service programs” and to follow up with customers to see if they have any questions or need connected to assistance programs. (CAUSE-PA Comments, p. 83.)

Requiring the Company to monitor and track accounts that receive energy education packets would be extremely time-consuming and would require implementing new processes to

track which customers are provided these packets. The Company recognizes CAUSE-PA's concerns regarding the effectiveness of energy education packets. Currently, CBOs provide the packets to customers upon request. Based on feedback from CBOs, customers do not frequently request the energy education packets. In addition, the Company believes it can leverage its existing communications through its CEOP to contact customers regarding enrollment in assistance programs. As such, subject to the Commission's approval, UGI proposes eliminating the distribution of energy education packets in its 2026-2030 USECP Compliance filing.

5. Energy Conservation Education

In its Comments, CAUSE-PA raises general concerns regarding the energy savings achieved through LIURP measures, pointing to declining savings achieved in 2021 as compared to 2019. CAUSE-PA concludes, without support, that one of the causes of this decline could be that UGI is not "providing its program administrators with adequately detailed information regarding its energy conservation education process or content and, as such, may not be fully utilizing its LIURP contractors to provide substantive and actionable education to its high usage customers." (CAUSE-PA Comments, p. 84.) As a result, CAUSE-PA recommends that the Commission conduct an additional review of the educational guidance provided to both UGI contractors and customers receiving energy education, and that it provide stakeholders the opportunity to comment on those materials. (CAUSE-PA Comments, p. 85.)

The Commission should reject CAUSE-PA's recommendation to undertake additional review and comments on the Company's energy education materials for contractors and customers. CAUSE-PA acknowledges that it does not "have enough information to pinpoint specific causes for this lower level of usage reduction, and educational gaps alone cannot possibly account for this pronounced decline in savings." (CAUSE-PA Comments, p. 85.) Given this admission, it is questionable what benefits would be derived from an extended review and comment period for the

energy education materials at issue. Further, UGI does not provide energy conservation tips to its contractors, as they are the energy conservation experts retained by the Company and provide energy conservation guidance based on their own knowledge, training, and experience. UGI's contractors are Building Performance Institute ("BPI") (or higher) certified, so their list of conservation measures should be comprehensive. Likewise, the energy education materials provided to customers come from contractors, not the Company. The Company maintains that its contractors are the appropriate providers of energy conservation advice and materials. For these reasons, CAUSE-PA's recommended review and comment period for energy educational materials is unnecessary and should be rejected.

6. Minimum Usage Threshold for Electric Baseload

CAUSE-PA supports UGI's baseload threshold of 6,000 kWh for non-heating customers and recommends that the Company adopt the same high usage threshold for electric heating customers. CAUSE-PA claims this would bring UGI in line with PPL Electric Utilities Corporation ("PPL Electric") and Duquesne Light, which employ a 6,000 kWh usage threshold for both baseload and non-heating customers. (CAUSE-PA Comments, p. 86.)

UGI disagrees with the recommendation to reduce the high usage threshold to 6,000 kWh for electric heating customers. UGI Electric is a much smaller EDC than either PPL Electric or Duquesne Light, and its LIURP budget is currently \$298,379. Reducing the usage threshold by more than 50% would be a significant program change and greatly increase the number of customers eligible for LIURP, and UGI Electric's LIURP budget could not support the eligibility levels. As such, UGI maintains that the Commission should approve the Company's proposed energy thresholds without modification.

7. Incidental Repairs, Health and Safety, and Deferrals

Regarding incidental repairs and health and safety budgets, CAUSE-PA recommends that UGI “be required to establish distinct parameters and budgets to address incidental repairs and health & safety issues through this proceeding,” to conform to the Commission’s Final Rulemaking Order. (CAUSE-PA Comments, p. 89.) The Company maintains that it will comply with any final regulations lawfully adopted and promulgated pursuant to the pending rulemaking proceeding at Docket No. L-2016-2557886. However, the Company cannot prejudge the outcome of that proceeding and opposes implementing additional changes to its USECP in anticipation of regulations that are not yet finalized.

Similarly, CAUSE-PA recommends that the Company anticipate the outcome of the pending rulemaking proceeding and amend its proposed USECP to increase coordination efforts between its LIURP and any nonprofit programs within its service territory that offer home repair services, arguing that the Company’s coordination with these other programs should be “comprehensive” and that the Company should explore leveraging the health and safety budget through “more formalized partnerships with other programs.” (CAUSE-PA Comments, p. 91.) Relatedly, CAUSE-PA claims that the Company does not provide “comprehensive” referral information to customers facing a health and safety issue.³

UGI relies on its partnerships with CBOs to help customers identify other programs and assistance that could be available in its service territory. The Company maintains that CBOs are the appropriate entities to assist with customer referrals to non-utility assistance programs, given their access to information about other regional programs that UGI may not be aware of. Requiring

³ CAUSE-PA also notes that PAHAF should be removed from the Company’s referral list because it is no longer in operation. (CAUSE-PA Comments, p. 90.) The Company acknowledges that the inclusion of PAHAF on its referral list was an oversight and can confirm that it no longer refers customers to the program. As such, the Company will remove the reference to PAHAF in its USECP Compliance filing.

UGI to maintain an exhaustive list of all potential programs that customers in its broad service territory could be eligible for and be responsible for referring its customers to those programs is inappropriate, given the close partnership with CBOs better positioned to be aware of and make those referrals. As such, the Company believes the Commission should reject this recommendation.

In addition, CAUSE-PA recommends that the Company track the reason for deferrals, again in anticipation of the implementation of the revised LIURP regulations. (CAUSE-PA Comments, p. 91.) The Company clarifies that it does track the reason for deferral in customer notes within its COS, but does not currently prepare a separate, formalized deferral report that includes those reasons. As noted above, the Company will comply with all reporting requirements related to LIURP deferrals in accordance with any final regulations lawfully adopted and promulgated pursuant to the pending rulemaking proceeding at Docket No. L-2016-2557886. However, the Company cannot prejudge the outcome of that proceeding and opposes implementing additional changes to its USECP in anticipation of regulations that are not yet finalized.

Finally, CAUSE-PA recommends that the Company maintain its list of deferrals for longer than the six months proposed in the 2026 USECP, and that the Company maintain its deferral list and periodically check in with customers on the list for at least two years. (CAUSE-PA Comments, p. 92.) The Company maintains that its current policy of maintaining a deferral list for six months is sufficient. Requiring the Company to periodically follow up with deferred customers for at least two years would require the Company to overhaul its current process for tracking deferrals through its contractors, who handle deferrals and tracking, which adds an administrative burden to those

limited resources. For these reasons, the Company does not agree with CAUSE-PA's recommendations.

8. Post-Installation Inspection

CAUSE-PA recommends that the details regarding UGI's post-installation inspection and remediation process of LIURP jobs be included in its 2026 USECP. (CAUSE-PA Comments, p. 92.) This information was provided to the Commission in the Company's original responses to the Requests for Clarification. UGI agrees to update its 2026-2030 USECP to include these process details.

CAUSE-PA states that it is unclear how UGI chooses homes that receive a post-installation inspection and recommends that the homes selected for a post-installation inspection should be a suitably representative sample of homes that have received services. (CAUSE-PA Comments, pp. 92-93.) UGI inspects all LIURP jobs completed 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. The Company maintains that this system adequately ensures that a representative sample of homes that have received LIURP services are inspected. As such, the Company believes that its current method for securing post-installation inspections is adequate and does not require revision.

CAUSE-PA also recommends that the Company begin to track customer complaints by contractor and by issue, and that UGI should be required to analyze the results of this tracking on a regular basis to identify repeat or systemic issues that may warrant further investigation or intervention. The Company agrees with CAUSE-PA's recommendation and will track customer complaints related to contractors. The Company also clarifies that it already reviews complaints with the original contractor to avoid similar issues in the future. The Company follows up with the original contractor first to remedy the issue; however, if the customer does not want the original

contractor to fix the issue, then the Company sends out a different contractor. The Company maintains that its existing process is reasonable and largely conforms to CAUSE-PA's recommendation. As such, the Commission should not require any additional reforms to the Company's follow-up process for customer complaints concerning contractors.

9. Landlord and Customer Consent

Regarding landlord and customer consent, CAUSE-PA makes several recommendations to align UGI's proposed USECP with the pending LIURP regulations. Specifically, CAUSE-PA recommends that UGI: (1) develop a process to begin accepting landlord approval for LIURP work by verbal and electronic means as required in revised Section 58.8(a)(1); (2) conduct targeted outreach to tenants related to the host of universal service programs for which they are eligible, which could be accomplished through community trainings, targeted outreach materials, and direct outreach and messaging to housing providers and tenant groups; (3) amend its USECP to explicitly include tenant eligibility for baseload measures and energy conservation regardless of landlord consent; and (4) be required to engage in targeted outreach to tenants and landlords throughout the course of each year, including engagement with local landlord associations, housing providers, and public housing authorities related to LIURP and weatherization services. (CAUSE-PA Comments, pp. 94-96.) OCA also recommends that, pursuant to the pending LIURP regulations, the Company be required to "implement additional options to facilitate customers' abilities to obtain landlord approval, such as approval by text or email and accepting e-signatures." (OCA Comments, p. 49.)

Regarding obtaining landlord consent in a form other than a physical signature, and to perform baseload measures regardless of landlord consent, these recommendations appear to be designed to conform UGI's proposed USECP with the pending revised LIURP regulations. As noted above, UGI will comply with any final regulations lawfully adopted and promulgated

pursuant to the pending rulemaking proceeding at Docket No. L-2016-2557886. Regarding the recommendations for additional and extensive outreach to landlords, tenants, and community organizations representing the same, UGI maintains that its current level of outreach is appropriate.

10. Contractor Training and Certification Requirements

In its Comments, CAUSE-PA states that it requires clarification regarding what UGI's periodic annual contractor training is and recommends that the Commission require UGI to further specify relevant details about UGI's LIURP certification and training requirements within its USECP, including the frequency of required training and any support provided to its contractor network. (CAUSE-PA Comments, p. 97.) The Company clarifies that its next contractor training session is scheduled for November 2025 and that it intends to conduct annual training sessions moving forward. The Company provides virtual training on the Company's LIURP policies and procedures, and how to use the COS to track measures performed for all contractors that are onboarded to perform LIURP services; this training is also provided when new personnel are employed by the contractors. In addition to the virtual training, the Company offers additional contractor training delivered by Pennsylvania College of Technology. The Company is hosting 2025 Contractor Training during November 2025 that will include the following sessions:

- Installer / Crew Leader In-Person, 7.5 hours - Treating Homes with Dirt Basement; and Building Materials and Code Requirements
- Auditor/QCI Workshop In-Person, 7.5 hours - LIURP Audit Process and Best Practices
- Wx for UGI Administrators – Online and In-Person, 6 hours each
- Customer Relations, Online Self-Paced, 3 hours

The Company regularly reviews and updates trainings to ensure they are delivering the most relevant, up to date content to contractors. The training adheres to industry standards, such as Building Performance Institute requirements. The Company maintains that its current training practices and procedures are sufficient and that no revisions are necessary. Moreover, the Company disagrees that these procedures should be memorialized in the Company's USECP. The Company should be afforded the discretion to engage with its contractors and undertake training as needed, and to develop training programs in response to the issues encountered in the field. Requiring the Company to lay out the details of its training program in the proposed USECP is unnecessary and could restrict the Company's flexibility in training moving forward.

11. Inter-Utility Coordination – Exceptions

In its Comments, CAUSE-PA expresses concern that UGI's "lack of flexibility" regarding its LIURP eligibility, specifically its high usage threshold, may forego opportunities for cost-effective leveraging and may prevent customers in need from accessing more comprehensive weatherization and efficiency measures capable of reducing overall household energy burden. (CAUSE-PA Comments, p. 98.) CAUSE-PA recommends that the Company "allow for limited waiver of its high usage threshold when services can be effectively coordinated with other federal, state, local, or utility weatherization or efficiency programs." (CAUSE-PA Comments, p. 99.)

UGI confirms that it will not grant an exception solely on the basis that a customer is participating in another utility's or state weatherization program. Here, the Company does not believe that participation in another weatherization program is a sufficient basis to provide an exception to its LIURP eligibility rules, particularly because it presupposes that the customer does not have excessive usage and is already benefitting from another weatherization program. Denying an exception on this basis does not mean that the Company is "inflexible" in providing exceptions, rather, the Company is mindful of allocating its limited resources. Indeed, the

Company reviews all accounts that request exceptions, regardless of the stated reason, and if a valid reason for an exemption exists, the Company will grant the exception. As such, the Commission should reject CAUSE-PA's recommendation to allow for a limited waiver of its high usage threshold for customers participating in other weatherization programs.

CAUSE-PA also recommends that "UGI should be required to define and explain *how* it intends to coordinate LIURP services with WAP and other efficiency programs within its Proposed 2026 USECP" and that "UGI should be required to track and report on the number of coordinated jobs completed each year to help identify successful collaboration efforts and inform future policy amendments." (CAUSE-PA Comments, p. 98) (emphasis in original).

The Company's contractors already work on other weatherization programs and are the responsible parties to coordinate with other efficiency programs. This is a reasonable delegation considering the expertise of the contractors and their experience working with other weatherization programs. CAUSE-PA has provided no data or analysis suggesting the existing process is not effective, and the suggestion should be rejected. The Company already reports the number of coordinated jobs it completes to the Commission in its annual report submitted in April of each year. As such, the Company is already implementing CAUSE-PA's second coordination proposal, and additional reporting requirements should not be imposed.

12. Rehabilitation Program

In its Comments, CAUSE-PA raises concerns that UGI did not complete any projects under its Rehabilitation Program between 2022 and 2024, and recommends that the Commission direct UGI to engage in targeted outreach to develop relationships with individuals and organizations who develop and restore affordable housing for low income individuals. (CAUSE-PA Comments, p. 101.)

The Company agrees with this recommendation in part. The Company will work with its Sales and Community Relations teams to identify potential Rehabilitation Program projects to make an effort to utilize the allocated budget. The Company has not left unutilized Rehabilitation Program funding unspent in the past; rather, it has used the funding for weatherization measures within its LIRUP.

C. CARES

1. CARES Program Funding

In its Comments, CAUSE-PA believes that the cost recovery method for CARES costs through the Company's operating expense budgets is appropriate, and notes that any future changes should be addressed in a base rate proceeding. (CAUSE-PA Comments, p. 102.)

UGI agrees with CAUSE-PA's recommendation and will continue to utilize the cost recovery method for CARES costs through the Company's operating expense budget.

2. LIHEAP Outreach

In its Comments, CAUSE-PA states that UGI's decision to reduce the number of LIHEAP Outreach Representatives from four to two is contrary to findings in the APPRISE Evaluation. (CAUSE-PA Comments, pp. 102-03.) According to CAUSE-PA, the APPRISE Evaluation found that survey respondents did not know about LIHEAP and did not know how or where to apply for LIHEAP. (*Id.*) Therefore, CAUSE-PA recommends that UGI consider implementing calling campaigns to increase customer awareness of the program's availability and the application process. (*Id.*)

UGI currently uses its dialer system to inform CAP and non-CAP customers of LIHEAP. The LIHEAP representatives are not performing outreach to alert customers about LIHEAP. Instead, they are taking calls from County Assistance Offices to provide information needed to process grant applications.

In addition, CAUSE-PA recognizes that UGI has made improvements to its efforts to reach CAP enrollees who are not accessing LIHEAP over the last several years, and those efforts have increased the number of CAP enrollees who receive LIHEAP. (CAUSE-PA Comments, p. 104.) However, CAUSE-PA asserts that there is still room for improvement and recommends that the Commission direct UGI to form a subcommittee of its USAC members to specifically address outreach to CAP customers regarding LIHEAP enrollment. (*Id.*)

UGI disagrees with this comment and does not believe creating another USAC subcommittee would be productive or a valuable use of resources. UGI is already working to inform customers about LIHEAP, including through social media, email, and the Company's website, while facilitating over \$34 million in LIHEAP grants over the last three years. Assistance program collateral mentions LIHEAP as part of all available assistance programs, and LIHEAP messaging can be found in Exhibits 11 and 12 of the CEOP. Additionally, the Low Income Assessment Pilot is a part of the 2025 UGI Gas Base Rate Case Settlement, which will be reviewed with USAC.

Lastly, CAUSE-PA asks for clarity as to whether the Company's "confirmed low-income email campaign" also encourages enrollment in UGI's CAP. (*Id.*) This campaign is conducted twice a year and applies to LIHEAP and Self-Reported Low Income ("SRLI") customers who are not enrolled in CAP. Examples of the marketing efforts can be seen in Exhibit 14 CEOP.

The SRLI Email Journey currently provides information about all USPs, including LIHEAP. Exhibit 11 of the CEOP shows the LIHEAP-specific email, while Exhibit 10 shows the bi-annual mailing UGI sends to SRLI customers who are not enrolled in CAP.

D. OPERATION SHARE ENERGY FUND

1. Eligibility – CAP Customers

In its Comments regarding Operation Share eligibility for CAP customers, CAUSE-PA recommends that the Commission direct UGI to clarify in its USECP that CAP customers are eligible for an Operation Share grant without having to prove an additional significant hardship. (CAUSE-PA Comments, p. 105.)

UGI agrees with this recommendation. CAP customers who are behind and, therefore, have hardship, do qualify for Operation Share. Such clarification can be provided in the Company's compliance USECP filing in this proceeding.

2. Operation Share Donations

In its Comments regarding the amount of Operation Share donations per customer, CAUSE-PA expresses a concern that UGI's anticipated customer contributions to Operation Share will decrease by 63% per customer over 10 years, as rates are rising and the need for assistance grows. (CAUSE-PA Comments, p. 106.)

UGI would like to note that pursuant to Paragraph 62(a) of the UGI Gas 2025 Base Rate Case Settlement Agreement, UGI Gas agreed to \$500,000 in additional company contributions to Operation Share, effective October 1, 2025.

Additionally, CAUSE-PA asserts that UGI's current efforts to solicit donations for its hardship fund are not enough and that the current efforts to expand the availability of relief are not sufficient. (CAUSE-PA Comments, pp. 106-07.) CAUSE-PA recommends that the Commission to require UGI to expand its efforts to solicit voluntary donations to support its hardship funds and to work with its USAC to develop a plan to do so. (CAUSE-PA Comments, p. 107.)

Currently, UGI believes that its methods to solicit donations from customers are adequate. Previously, UGI included a bill insert monthly to solicit donations for many years; however, that

did not seem to have a noticeable impact. The Company has increased contributions to Operation Share over the years and believes that it is adequately funded. While customer donations may have decreased, the Company's contribution remains sufficient. Additionally, prior Base Rate Cases have added funding, and more recent Base Rate Cases have allowed the Company to reallocate within its gas regions when need is greater in different regions.

Lastly, CAUSE-PA recommends that the Commission expressly require UGI to improve the solicitation of its e-bill customers. (*Id.*)

UGI agrees with this recommendation and will send e-bill customers annual messaging providing information about Operation Share and how to donate in a dedicated email. UGI will incorporate this change into the final USECP.

3. Exceptions to Maximum Grant Amounts

CAUSE-PA states that it does not support the removal of UGI's discretion in approving grants that may exceed the \$600 maximum grant amount, and recommends that UGI identify general parameters for when an exception may be made; specifically, applying reasonable exemptions when needed to prevent a shut-off or facilitate the reconnection of medically vulnerable households, households with young children, or households with seniors. (CAUSE-PA Comments, pp. 108-09.)

UGI notes that there are other internal mechanisms that allow it to assist customers as described by CAUSE-PA, including empowerment. Regardless, the maximum grant amount has been included in its plan for flexibility. For example, the LIHEAP delay in 2025 is a clear case where the flexibility to exceed the maximum amount is a favorable option for customers. Having discretion during times of customer need, *e.g.*, when LIHEAP lacks sufficient federal funding and is unavailable, allows the Company to readily support customers during a crisis.

4. Regional Operation Share Budget Reallocation

In its Comments, CAUSE-PA notes its support of UGI’s criteria for Operation Share reallocation, ensuring that customers are not denied assistance solely based on the County or region they reside in. (CAUSE-PA Comments, pp. 109-10.) Still, it reiterates the recommendation that UGI improve training and support for its CBO network to ensure that each agency effectively and efficiently manages Operation Share funds, to ensure that customers in need can fairly access relief and are not disadvantaged based on where they live. (*Id.*)

UGI appreciates this support from CAUSE-PA and notes this recommendation regarding CBO training and support to effectively manage Operation Share funds.

E. PROJECTED NEEDS ASSESSMENT

1. Estimated and Confirmed Low Income Count

In its Comments, CAUSE-PA asks the Commission to require that UGI recalculate its confirmed low-income customer count and its subsequent needs assessment based on the definition approved in the 2025 Settlement. (CAUSE-PA Comments, p. 112.) Additionally, CAUSE-PA recommends that UGI update its needs assessments based on its confirmed definition of low-income customers. (*Id.*)

The Company notes that Paragraph 67(a) of the UGI Gas 2025 Base Rate Case Settlement includes language regarding the Company’s definition and identification of “confirmed low income” customers. That section of the Base Rate Case Settlement covers this issue, and the USECP was filed before the UGI Gas 2025 Rate Case Settlement was submitted and approved. Further, UGI will comply with its budget and the Notice of Proposed Rulemaking (“NOPR”) regulations regarding this comment. This is opposed to attempting to do a needs assessment now, then having to redo it when NOPR is released and amending the USECP based on the updated NOPR budget criteria. A needs assessment is developed based on list of the most reasonable and

accurate estimates of the population of customers who qualify for LIURP. UGI would prefer to wait until the NOPR is implemented to amend its USECP and implement an updated needs assessment and budget.

2. Calculation of Low-Income Customers in the Needs Assessment

In its Comments, OCA also discussed the calculation of low-income customers in the needs assessment. Specifically, regarding the definition of “Confirmed Low-Income” customers, OCA requests that UGI provide details on what the Company considers sufficient to establish a customer as confirmed low-income. (OCA Comments, p. 45.) Additionally, OCA avers that requiring a customer to be “income verified” adds a qualification to the “Confirmed Low-Income” customer status that exceeds the Commission’s regulations. (*Id.*, p. 46.)

UGI maintains that its USECP requires participants to be income-verified to participate in the program; mere verbal acceptance is sufficient for self-certification. Paragraph 67 of the UGI Gas 2025 Base Rate Case contains the definition of “confirmed low income” that the Company uses, which states:

- (a) UGI will modify its policies and procedures regarding the definition and identification of “confirmed low income customers” to include all house-holds for which UGI has information that would make it “reasonably likely” that the household has income at or below 150% FPL, consistent with the Commission’s definition in 52 Pa. Code 62.2 and 69.262. Households that fit this criteria include:
 - i) Self-certification;
 - ii) Participation in any of the Company’s income verified programs, including but not limited to CAP, Operation Share, or LIURP, where income is verified to be at or below 150% FPL; and/or
 - iii) Receipt of LIHEAP funds in the prior 12 months.

Further, Paragraph 67(b) states:

UGI Gas will incorporate the Commission’s definition for the term “confirmed low income customer” within its residential tariff and will no longer maintain a separate

definition or criteria for the term “confirmed low income customer”. However, for purposes of enrollment in USPs, customers must go through the Company’s income verification process.

Additionally, OCA suggests that UGI confirm whether it includes all the categories identified in the Commission’s regulations, including self-certification, in its calculation of the number of Confirmed Low-Income customers. (OCA Comments, p. 46.)

In response to this comment, UGI confirms that its Confirmed Low-Income customers include self-certified as referenced above in Paragraph 67(a) of the 2025 UGI Gas Base Rate Case Settlement.

Moreover, OCA suggests that, to the extent that the Company does not include customers who have self-certified in its definition of Confirmed Low-Income customers in Table 8 of the Commission’s July 24, 2025, Order, the OCA recommends that the Company broaden the definition to be consistent with Section 62.2. (OCA Comments, p. 47.)

UGI concurs with this recommendation. In fact, the Company already agreed to amend its definition of “confirmed low-income customer” under Paragraph 67(a) of the UGI Gas 2025 Base Rate Case Settlement accordingly.

Lastly, regarding the CAP enrollment size, OCA recommends that the CAP enrollment size serving all eligible customers be equal to the Estimated Low-Income (“ELI”) customers rather than the Confirmed Low-Income Customers. (OCA Comments, p. 47.)

The Company disagrees with this recommendation and finds that ELI customers are based on census data and are inflated relative to actual customers within the service territory.

3. Customers in Need of LIURP

In its Comments, CAUSE-PA states that it requires additional information necessary to independently assess UGI’s assertion that it properly assessed the regulatory factors in sections

58.4(c)(1)-(4) in order to determine the estimated number of customers in need of LIURP. (CAUSE-PA Comments, pp. 113-14.)

To better respond to this suggestion, UGI needs clarification regarding what additional information CAUSE-PA is missing to independently assess UGI's assertion that it properly assessed the regulatory factors in Section 58.4(c)(1)-(4) of the Commission's regulations to determine the estimated number of customers in need of LIURP. If CAUSE-PA can provide that information, UGI will be able to provide a more robust response to this suggestion.

4. Projected Needs Assessment for UGI Electric

In its Comments, CAUSE-PA requests that the Commission to require UGI to update its needs assessment for UGI Electric based on the definition of confirmed low-income in 52 Pa. Code §§ 54.72 and 69.262, as well as its census-based estimated low-income customer count. (CAUSE-PA Comments, p. 114.) CAUSE-PA also recommends that UGI apply consistent definitions of the term confirmed low-income for both its gas and electric divisions. (*Id.*)

UGI disagrees with CAUSE-PA's recommendation for UGI to update its needs assessment for UGI Electric. Due to UGI Electric's size, it is not required to conduct a needs assessment under the Commission's regulations. However, in its July 24, 2025, Order in this proceeding, the Commission directed UGI to provide a needs assessment for UGI Electric as part of its Supplemental Information. UGI complied with that directive and provided the needs assessment with the Supplemental Information filed on August 25, 2025. For ease of reference, the needs assessment provided on page 24 of the Supplemental Information is set forth below:

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

Furthermore, per the UGI Gas 2025 Base Rate Case Settlement Agreement, UGI will apply the term “confirmed low-income” consistently across both UGI Gas and UGI Electric.

F. PROJECTED ENROLLMENT LEVELS

In its Comments, CAUSE-PA asserts that UGI should be required to adjust its projected enrollment levels to serve all eligible customers over a reasonable period of time based on its reviewed assessment of need. (*Id.*)

UGI notes that the amended version of Section 58.4 of the Commission’s regulations in the NOPR describes how to calculate a budget, ELI customers, CLI customers, the number of eligible customers, and historical participation rates. Therefore, assuming that such modifications become final and are adopted, UGI will develop budgets in accordance with the criteria set forth in the NOPR.

CAUSE-PA also contends that it is unreasonable to set projected enrollment levels at a pace that will not reach all eligible customers for 27 years, as UGI proposed to do in its flawed needs assessment. (CAUSE-PA Comments, p. 115.)

In response, UGI once again refers CAUSE-PA to amended Section 58.4 of the Commission’s regulations in the NOPR. Further, any acceleration to reach all eligible customers comes with increased costs that are recovered from customers through the USP Rider. Those cost and rate considerations must be balanced against any increased pace in enrollment. However,

CAUSE-PA does not specify a timeframe that it would consider as reasonable. Regardless, UGI believes that these discussions are better suited for the NOPR proceeding, not an individual utility's USECP.

Furthermore, CAUSE-PA believes that, due to the complexity of the issue and the need for further factual information to fully assess the reasonableness of projected enrollment levels and corresponding budget, CAUSE-PA submits that this issue should be referred to the Office of Administrative Law Judge to develop a factual record from which to make a determination. (*Id.*)

UGI does not believe there are any issues of material fact in dispute that would require the case to be referred to the Commission's Office of Administrative Law Judge for further review and hearings. Thus, the Company respectfully requests that the Commission enter a Final Order approving UGI's USECP, as modified by these Reply Comments.

As for the OCA's Comments on this topic, OCA alleges that the number of CAP participants is quite low, given the estimated number of low-income customers. (OCA Comments, p. 51.)

In response, UGI has undertaken significant efforts to increase CAP enrollment, including marketing the program and conducting a low-income assessment pilot program with Experian. In the pilot program, approximately 100,000 customers, both income-verified and self-certified, were included in the Company's marketing efforts. The Company continues to participate in efforts to increase CAP participation and has seen a 30% increase in CAP enrollments since the end of 2022.

Additionally, OCA recommends that UGI provide an explanation as to why its current USECP has a projected participation for 2030 that is more than 10,000 fewer than its "participation goals" published just a year earlier in the APPRISE Evaluation. (OCA Comments, pp. 51-52.)

UGI maintains that its prior USECP Plan was based on projections calculated over seven years ago and, in retrospect, were overly optimistic and represented an unachievable forecast. Projections for the 2026-2030 USECP were based on more recent historical data and should be used for projecting customer participation in the USECP.

G. PROGRAM BUDGETS

1. LIURP Budget

In its Comments, CAUSE-PA states its support for UGI's proposal to rollover unspent LIURP funds and add them to the budget for the following program year. (CAUSE-PA Comments, p. 116.) However, it recommends that the Commission direct UGI to update its USECP to clearly state that unspent LIURP funds will be rolled over and added to the subsequent program year's budget. (*Id.*)

UGI is willing to agree to this recommendation, which is also consistent with the LIURP NOPR.

In addition, CAUSE-PA is supportive of UGI's proposal to increase LIURP funding each year, but believes the percentage increase is more appropriately tied in this case to UGI's ability to meet identified needs. (CAUSE-PA Comments, p. 117.) Further, CAUSE-PA believes that the increase in funding approved in UGI's rate case should not be construed to replace its proposal to increase LIURP funding annually following the 2026 program year. (*Id.*)

UGI states that the NOPR defines budget expectations. However, the Commission has cautioned against adding items from NOPR into USECP since the process has not yet been finalized. *See Columba Gas of Pa., Inc. Universal Service and Energy Conservation Plan for 2024-2028 in Compliance with 52 Pa. Code § 62.4*, 2024 Pa. PUC LEXIS 107, at * 53-54 (Order entered Apr. 4, 2024) (stating “[w]e are not inclined to allow Columbia or any other public utility

to adopt proposed revisions to the LIURP regulations until the rulemaking proceeding is completed”).

In its Comments, OCA supports UGI’s ability to modify the LIURP budget in an applicable base rate proceeding. (OCA Comments, p. 40.) However, OCA disagrees with the notion that the only mechanisms for setting a LIURP budget are through the base rate proceeding or a pro forma 3% increase per year. (*Id.*)

UGI maintains that the LIURP budget is included in the USECP and was adjusted through Paragraph 60(a) of the UGI Gas 2025 Base Rate Case Settlement. The budget is based on the availability of contractors and the ability to reach a number of homes (and obtain access inside the home) to perform weatherization services. Neither budget nor resources are unlimited.

Furthermore, OCA avers that LIURP spending and budget should be set at a level sufficient to reach a prescribed percentage of eligible households within a time certain. (OCA comments, pp. 41-42.) OCA recommends that the LIURP budget be tied to the Needs Assessment. (OCA Comments, p. 42.) OCA further recommends that the Commission require UGI to determine a budget appropriate to meet the needs in its service territory using the existing factors found at 52 Pa. Code Section 58.4(c) and that budget be set as an initial budget that should be re-visited by UGI throughout the duration of its plan to account for increased needs and increased costs for UGI to provide services and for consumers in terms of rates that should be mitigated through weatherization assistance. (*Id.*)

UGI states that there is a limited number of weatherization contractors available to do work for all utilities in Pennsylvania, and this needs to be taken into account.

Third, OCA suggests that there should be a process developed for UGI to provide information at least every two years demonstrating that its LIURP budget is sufficient and that it

accounts for changes that occur, including intervening rate increases. (OCA Comments, p. 43.) OCA further suggests that stakeholders be permitted to comment upon and propose adjustments to the LIURP budget during these interim filings that occur between USECP filings. (*Id.*)

UGI submits its regulatory LIURP reports to BCS in February and April of each year, which contain information that is solely related to LIURP. UGI is unable to agree with the recommendation to allow stakeholders to comment on and propose adjustments to the LIURP during interim filings. This recommendation is not in any existing regulation or policy statement. Parties can request information in USECP and Base Rate Case proceedings to review it, and they regularly do. The request exceeds what is allowed under the current regulatory structure.

Fourth, OCA avers that the proposal to apply an increase only during a rate case or by 3% does not consider additional factors that may impact the ability of the budget to address the projected number of homes such as increases to construction costs, higher than budgeted-for inflation, tariff changes, etc., and that these factors to weatherization costs bear no relationship to the percentage increase in rates. (*Id.*) Additionally, OCA suggests that UGI also consider whether, if an inflation factor is applied, it should be more closely tied to construction costs or some other factor that relates to an index of weatherization costs. (*Id.*)

UGI's budget is based on available resources and funds, neither of which is unlimited or will ever be. UGI's budget is managed in accordance with other programs and requirements as a regulated public utility. Therefore, UGI avers that a 3% annual increase is achievable and reasonable.

Lastly, OCA seeks clarification as to what the congruence is between the needs assessment and the LIURP budget and how the information in the needs assessment is applied to the LIURP

budgets. (*Id.*) OCA submits that there should be greater congruence between the Needs Assessment and the budget and expresses concern over low LIURP enrollments. (*Id.*)

UGI's budget is set as part of prior regulatory efforts. Its needs assessment shows an unachievable number of customers needing weatherization, which is limited by contractor availability, the number of homes needing weatherization, and the cost if completed within five years.

2. Rollover of Unspent LIURP Dollars

In its Comments, OCA summarizes that UGI has proposed discontinuing the carryover of unspent LIURP funds to the next program year and asserts that OCA disagrees that the unspent dollars should not be carried forward. (OCA Comments, p. 44.) In other words, OCA supports the continued rollover of unspent LIURP dollars and avers that the proposal that UGI discontinues the carrying over of unspent LIURP funds to the next year is inconsistent with the Commission's revised LIURP regulations at 52 Pa. Code 58.4(d.1). (*Id.*)

In response to this suggestion, UGI points to Paragraph 60(b) of the UGI Gas 2025 Base Rate Case Settlement, which specifies that the increased LIURP budget shall remain unchanged until a change is approved by the Commission. Additionally, Paragraph 60(c) of the UGI Gas Base Rate Case states that UGI Gas will rollover unspent funds. Further, as noted previously, UGI will adhere to the regulations that result from the Commission's NOPR proceeding.

Further, OCA suggests that there should be a way to address chronic overestimation of budgeting, and thus, that if, after several years, UGI is unable to spend its LIURP allocation, it should be required to propose a plan amendment to modify its budget or its plan to reach more households. (OCA Comments, p. 45.)

UGI disagrees with this comment and does not believe that there has been a "chronic overestimation of budgeting." UGI's LIURP spending has been at 90% of its allocated budget over

the last four years. Further, UGI has agreed to rollover its funding, consistent with the NOPR. Neither OCA nor the Commission should be engaged in providing estimates for utility LIURP projects. Budgets have been increased in UGI's Base Rate Case proceedings.

H. USE OF COMMUNITY-BASED ORGANIZATIONS (CBOS)

In its Comments, CAUSE-PA states that it strongly supports UGI's ongoing use of CBOs in the delivery of services. (CAUSE-PA Comments, p. 118.) CAUSE-PA recommends that UGI provide CBOs with additional ongoing training and support. (*Id.*)

UGI appreciates CAUSE-PA's support and will continue to provide CBOs with ongoing training and support as applicable.

I. ISSUES NOT ADDRESSED IN THE JULY 2025 ORDER

1. CAP Shopping

In its Comments, CAUSE-PA strongly supports UGI's reforms regarding CAP applicants who are shopping with a supplier. (CAUSE-PA Comments, p. 118.) However, CAUSE-PA believes that more must be done to protect low-income customers from excessive prices in the competitive market, which, in turn, leads to higher collections and terminations and prevents additional costs from increasing universal service costs for other consumers. (*Id.*)

Regarding this suggestion, UGI states that it is constrained as to what it can do to advise applicants who are shopping with a supplier. The PUC sets parameters around customer protections in the competitive marketplace.

Furthermore, CAUSE-PA requests that the Commission take action to reduce the gas-switching timeframe, modernize the marketing regulations, and empower consumers to act more quickly to get out of a bad deal. (CAUSE-PA Comments, p. 120.)

UGI disagrees with this recommendation and finds that it is outside the scope of this proceeding. If the Commission desires to take further action regarding this recommendation, it must petition for rulemaking.

2. Service Restoration for CAP Eligible Customers

In its Comments, CAUSE-PA expresses a concern about the disparate treatment of customers whose service is active and those who have had their service terminated within the last 30 days. (CAUSE-PA Comments, pp. 121-22.) According to CAUSE-PA, one low-income customer should not be treated differently from another simply because the home was scheduled for termination on a different day. (*Id.*) Under the Commission's regulations, a customer remains a customer for 30 days after service is terminated, and CAUSE-PA submits that they should be treated as such for purposes of enrollment in CAP. (*Id.*)

UGI maintains that an applicant must be an active customer to enroll in CAP, so this suggestion would require additional IT development and incremental costs. Once the customer is reconnected, they are enrolled in CAP. Otherwise, reconnection rules are consistent with the Commission's regulations.

In addition, CAUSE-PA recommends that the Commission direct UGI to amend its USECP to allow all customers – including those within 30 days of termination – to qualify for CAP as a means of restoring service, provided they meet all other eligibility requirements for the program. (CAUSE-PA Comments, p. 122.)

UGI maintains that there is nothing in the Commission's regulations, policy statement, or term/restore requirements that dictates this. A change like this should be part of industry rulemaking.

Lastly, CAUSE-PA recommends that UGI develop outreach materials for customers whose service has been terminated to inform them that service may be restored by enrolling in CAP if

they are otherwise eligible for the program, and provide them instructions on how to do so. (CAUSE-PA Comments, p. 122.) Under this proposal, CAUSE-PA states that UGI should be directed to coordinate with its USAC to develop these materials and its outreach plan. (*Id.*)

Further, as part of the UGI Gas 2025 Base Rate Case Settlement as Paragraph 67(c), UGI agreed to notify customers of the option to enroll in CAP. Credit scripts, door hangers, and termination notices were all updated to reflect the change, and the change was implemented on October 26, 2025.

3. Protections for Victims of Domestic Violence

In its Comments, CAUSE-PA lists several revisions to improve adherence to the applicable legal requirements for the application of survivors of domestic violence and to better protect survivors from harm who have a Protection From Abuse Order (“PFA”):

- (1) Recommends that the Commission direct UGI to explicitly state in its Proposed 2026 USECP that the Company accepts PFAs and other court orders issued in the Commonwealth that provide clear evidence of domestic violence.
- (2) Recommends that UGI be directed to clarify its processes related to retention of PFAs and other orders, and monitoring of survivor accounts. Specifically recommends that UGI should be directed to develop processes whereby
 - a. A customer who has provided a PFA or other court order to UGI should have their account marked as having the requisite protections, and
 - b. Those marked accounts should be enhanced with privacy protections, including limits on who can receive account information, and notices to the account holder if there are any changes to the account
- (3) Recommends that the Commission direct UGI to ensure that the employees who are responsible for survivor engagement and monitoring receive specialized training related to survivors’ particular rights and needs. Recommends that UGI contact the Pennsylvania Coalition Against Domestic Violence (“PCADV”) to arrange suitable training for its staff.

(CAUSE-PA Comments, pp. 123-24.)

In response to these suggestions, UGI maintains that its processes are adequate to protect customers and that the Company complies with existing regulations applicable to those with PFAs. CAUSE-PA’s recommendations regarding PFAs go beyond what is required of utilities under

Chapter 56 of the Commission's regulations that apply to PFAs. For these changes to be implemented, they would need to be a part of the Commission's rulemaking process. Further, UGI states that there are currently only two Outreach representatives who handle PFAs. When a PFA is created, the customer is provided with information on obtaining a new account number and protecting the account with a password. The Company's role is limited to protecting account and personal information, and any external specialized training is beyond the scope of that role.

J. MISCELLANEOUS CONCERNS

1. Minimum Payments

In its Comments, OCA expresses a concern about the minimum bill charge for customers who receive electric and natural gas service from UGI. (OCA Comments, p. 38.) Therefore, OCA recommends that the electric minimum non-heating charge be reduced to \$10 and the natural gas minimum charge to \$20, so that the sum of the natural gas and electric heating equals the electric heating. (*Id.*)

UGI believes this would require additional IT programming if applied to customers who receive both gas and electric service. UGI maintains that if there are separate service utilities, customers would incur two separate charges and must pay for what they use. Again, UGI believes that this is a ratemaking issue that should be addressed as part of a Base Rate Case, not a USECP.

2. Ongoing USECP Monitoring and Refinement

In its Comments, OCA recommends that UGI continue to monitor the program's outcomes to evaluate whether its USECP is achieving its intended results. (OCA Comments, p. 39.) OCA also suggests that the Commission direct UGI to develop specific outcomes and metrics by which those outcomes should be monitored, with input from its USAC, to be presented by the end of 2026 or UGI's next base rate proceeding, whichever comes sooner. (*Id.*)

UGI maintains that Paragraph 61(d) of the UGI Gas 2025 Base Rate Case Settlement addressed this issue and that the Company is not required under the Commission's rules to provide the type of monitoring and evaluation suggested by OCA. Currently, UGI conducts monitoring and submits annual reports to the Commission's BCS. There is no Commission regulation that requires UGI to provide a separate report. If metrics were required, they should be industry-wide, not for a single utility. Accordingly, if the Commission would like all utilities to submit such a report, the Commission would need to conduct a rulemaking proceeding.

Moreover, OCA lists areas where it believes continuous monitoring is appropriate:

- (1) In addition to tracking low-income disconnection rates and reporting those findings to the Commission and the parties, UGI should include a plan for how it intends to reduce its rate of disconnections for low-income customers.
- (2) UGI should have a clear outcome objective regarding the percentage of low-income customers in debt.
- (3) UGI should develop results-oriented outcome objectives to set clear goals for increasing its enrollment of confirmed low-income customers in CAP, and retaining those CAP participants once enrolled.
- (4) UGI should, as part of the plan it files pursuant to the plan recommended in the first bullet, include an evaluation of its progress at achieving such goals for consideration in future proceedings.
- (5) UGI should carefully track the costs of its programs.

(OCA Comments, pp. 39-40.)

UGI reiterates that it already conducts monitoring, evaluates its programs in accordance with Commission regulations, and submits annual reports to the Commission's BCS. Further, tracking of the number of nonpayment disconnections for confirmed low-income customers is specifically required under Paragraph 61(d) of the UGI Gas 2025 Base Rate Case Settlement. Also, under that same paragraph of the Settlement, if UGI Gas does not demonstrate reductions, the Company must submit a plan with relevant recommendations as to how it might reduce that number in the future.

3. Unresolved APPRISE Evaluation Issues

First, in its Comments, OCA recommends that the Commission direct UGI to address any unaddressed issues raised in the APPRISE Evaluation in its final 2026 USECP. (OCA Comments, p. 53.)

UGI agrees to assess all recommendations to determine the cost and effort required to implement them.

Second, OCA submits that being required to provide personal data, such as household expense data, may serve to chill CAP applications. (OCA Comments, p. 54.) OCA also recommends that the APPRISE recommendation to consider removing household expense data from the CAP application be implemented. (*Id.*)

UGI's implementation of the CAF will eliminate these items, rendering this recommendation moot.

Third, OCA suggests that UGI address how to compensate agencies for mailing letters to customers solicited for CAP participation. (*Id.*)

To undertake this recommendation, UGI maintains that it would need full and current recovery for additional compensation under its USP Rider, which is negotiated in contracts and would be addressed, if needed, with each agency when agreements are up for renegotiation. It is in UGI's and its ratepayers' best interests to keep Company costs down.

Fourth, OCA suggests that UGI address the difficulties that agencies have had in obtaining information from UGI. (*Id.*)

CBOs have not expressed any concerns over obtaining information from UGI. UGI maintains ongoing email correspondence with agencies, and inquiries are typically answered within one business day or sooner.

Lastly, OCA suggests that UGI address how it intends to address the main challenge identified in the APPRISE Evaluation, that the agencies have run out of funds. (OCA Comments, p. 55.)

UGI will audit agencies to ensure they are following rules regarding maximum grant amounts and that they do not exceed the amount owed to stop termination, among other things. Further, under Paragraph 62(b) of UGI Gas's 2025 Base Rate Case Settlement, UGI Gas has greater flexibility with program budgets and customer demand across and between former UGI Gas rate district geographic areas. Specifically, UGI Gas was permitted to increase the annual budget reallocation limitation across the geographic footprint of its former three rate districts from 5% to 50%, and if any reallocation of funds from one of the former rate districts to another exceeds 25%, UGI Gas will file a letter with the Commission at the USECP docket explaining the reason for the reallocation. Also, pursuant to Paragraph 62(a) of UGI Gas's 2025 Base Rate Case Settlement, UGI Gas agreed to increase its annual shareholder donation to Operation Share by \$500,000 and will maintain this donation level until the effective date of rates established in the next base rate case. This affords UGI with greater flexibility to move budgets between rate districts.

III. CONCLUSION

WHEREFORE, UGI Utilities, Inc. respectfully requests that the Commission consider these Reply Comments in its disposition of the Proposed USECP. As discussed above, UGI Utilities, Inc. is agreeable to modifying certain aspects of its Plan to address the issues, concerns, and recommendations set forth in the other parties' Comments. The Company respectfully requests that the Commission enter a Final Order approving the USECP as modified by these Reply Comments.

Respectfully submitted,



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Date: November 10, 2025

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