



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

December 19, 2025

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
UGI Utilities, Inc. – Gas Division
Docket No. M-2025-3032708
I&E Reply to the Letter of CAUSE-PA

Dear Secretary Homsher:

Enclosed for electronic filing is the **Reply of the Bureau of Investigation and Enforcement to the Letter of CAUSE-PA** in the above-referenced matter.

Copies have been served on the parties of record and interested parties in accordance with the Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

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

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318204
(717) 783-5243
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GR/nb
Enclosures

cc: Allison C. Kaster, Director, I&E (via email – akaster@pa.gov)
Carrie B. Wright, Deputy Chief Prosecutor, I&E (via email – carwright@pa.gov)
Office of Special Assistants (via email – ra-OSA@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REPLY OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT
TO THE LETTER OF CAUSE-PA**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

On March 24, 2025, pursuant to 52 Pa. Code §§ 3.113(b)(3), 5.41 and 5.232, the Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) Bureau of Investigation and Enforcement (“I&E”) and UGI Utilities, Inc. — Gas Division (“UGI” or “Company”) filed a Joint Petition for Approval of Settlement (“Settlement” or “Settlement Agreement”) at the above docket to amicably resolve I&E’s informal investigation regarding improper terminations of gas customers by UGI due to incomplete personal phone contact.

I&E’s investigation was initially based upon information provided by the Commission’s Bureau of Consumer Services (“BCS”), supplemented by I&E’s own investigation which resulted in a Settlement comprised of a substantial monetary civil penalty and numerous remedial measures— both monetary and non-monetary—as set

forth therein and as supported by accompanying Statements in Support expressing the individual views of I&E and UGI.

From its Public Meeting held May 8, 2025, the Commission entered an Order to seek public comment on the Settlement Agreement, consistent with the requirement imposed in 52 Pa. Code § 3.113(b)(3), before issuing its Final Order (“May 8 Order”). Pursuant to the May 8 Order, interested parties had twenty-five (25) days following publication of the May 8 Order in the *Pennsylvania Bulletin* to submit comments. The May 8 Order was published in the *Pennsylvania Bulletin* on May 24, 2025.¹ Accordingly, comments were due on or before June 18, 2025. Two comments were filed by the Pennsylvania Office of the Attorney General’s Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”).

On July 3, 2025, I&E filed its Reply Comment. On July 22, 2025, UGI filed its Reply Comment. On October 9, 2025, in response to the comments and reply comments, the Commission stayed the proceeding and ordered UGI and I&E to submit supplemental statements in support and/or stipulated facts in support of the proposed Joint Petition for Approval of Settlement.” The Commission specified eight questions or requests for information for UGI and I&E to address in a supplemental statement of facts.

On November 7, 2025, pursuant to the Commission’s Order, I&E and UGI submitted their “Supplemental Record to Joint Petition for Approval of Settlement,”

¹ 55 Pa. B. 3703 (May 24, 2025).

(“Supplemental Record”) addressing each of the eight questions or requests for information set forth by the Commission.

On November 26, 2025, CAUSE-PA again submitted comments via a letter to the Commission. I&E hereby files its response to those comments.

II. REPLY TO THE LETTER OF CAUSE-PA

In its November 26, 2025, Letter, CAUSE-PA alleges procedural defects with the Supplemental Record. Specifically, CAUSE-PA noted that the Supplemental Record did not contain a verification. CAUSE-PA also averred that the Supplemental Record was not “authenticated,” and should therefore not be considered part of the record for purposes of the Joint Petition for Approval of Settlement. CAUSE-PA also makes allegations that the Supplemental Record is procedurally defective because it was not served on CAUSE-PA and that the Supplemental Record submitted by I&E and UGI did not comply with the October 9, 2025, Order.² As explained below, these averments should be disregarded.

First, CAUSE-PA’s insistence that the Supplemental Record not be considered by the Commission because it did not contain a verification is based on an inaccurate reading of that rule. Verification is required for “[a]pplications, petitions, formal complaints, motions and answers thereto” which contain “an averment of fact not appearing of record in the action or containing a denial of fact.” 52 Pa. Code § 1.36. The Supplemental Record submitted by I&E and UGI, as parties to the Settlement, is not an application, petition, formal complaint, motion, or answer thereto, and therefore does

² Letter of the Pennsylvania Utility Law Project and CAUSE-PA, Docket No. M-2025-3032708 (November 26, 2025), p. 2.

not require a verification. It is additional information provided in response to a request for such information from the Commission in the context of a settlement petition.

Second, CAUSE-PA avers that the Supplemental Record is not authenticated. It is unclear what CAUSE-PA means by “authentication.” Authentication is a rule of evidence. I&E and UGI, as parties to the Settlement, have provided further detail in response to the Commission’s October 9, 2025, Order by way of the Supplemental Record and neither party is proffering evidence in an evidentiary hearing. The averment in CAUSE-PA’s Letter that the Supplemental Record not be considered by the Commission because it is not “authenticated” should be disregarded.

Third, CAUSE-PA also states that the Supplemental Record did not “contain any explicitly stipulated facts” and cites 52 Pa. Code §§ 1.36, 5.41, and 5.232. That is simply untrue as I&E and UGI provided additional detailed information in response to the Commission’s questions and requests. The information contained therein speaks for itself and the Commission may give it the weight it deems appropriate. Additionally, as stated above, the rule relating to verifications is not applicable here. Neither is Rule 5.41, which relates to petitions, and the Supplemental Record is not a petition. It is unclear why Rule 5.232 is cited, but I&E and UGI, as the only parties to the Settlement, followed that Rule with the filing of the Joint Petition for Approval of Settlement.

Fourth, CAUSE-PA objects to the fact that it was not served with a copy of the Supplemental Record, and appears to assert either that the Commission ordered I&E to serve them or that it was entitled to be served because it signed up for the Commission’s eFile system. CAUSE-PA cites to 52 Pa. Code § 1.51 for this proposition.

However, the Commission did not in fact require I&E or UGI to serve CAUSE-PA or any other non-party with the Supplemental Record. Neither does the Commission's Rule 1.51, 52 Pa Code §1.51, compel service of any filing at this Docket on CAUSE-PA. Rule 1.51 provides in relevant part that "[t]he Commission will make available to filing users on the electronic filing system a service list for each docket in which they are a party...." 52 Pa. Code §1.51. However, CAUSE-PA is not on a service list for this Settlement because it is not a contested matter with a service list. Further, CAUSE-PA is not a party to the Settlement. There has been no petition to intervene, and no entry of appearance of counsel, filed by CAUSE-PA.

I&E again reiterates that the resulting Settlement achieves the goal of reaching an amicable resolution of the issue at hand while accomplishing this task in an efficient and economical manner. I&E stands by the Joint Petition for Approval of Settlement that has been submitted to the Commission in this matter and respectfully requests that the Commission adopt the Settlement without modification.

Respectfully submitted,



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

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CERTIFICATE OF SERVICE

I hereby certify that I have this day, December 19, 2025, served a true copy of the foregoing **Reply to Letter** upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Electronic Mail:

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