



**December 22, 2025**

To: All Parties of Record at Docket Nos.:  
M-2025-3054362, M-2025-3054366, & P-2025-3054381  
UGI Utilities Inc. Universal Service and Energy Conservation Plan (USECP) for  
2026-2030

**RE: UGI Utilities Inc. Proposed 2026-2030 USECP Needs Assessment**

*Overview*

On April 1, 2025, UGI Utilities, Inc. (UGI) filed its 2026-2030 USECP (Proposed 2026 USECP) at the above-captioned dockets. On July 24, 2025, the Pennsylvania Public Utility Commission (Commission) entered an Order (July 2025 Order) in the above-captioned proceeding directing UGI to file supplemental information and establishing a comment and reply comment period.

On August 25, 2025, UGI filed supplemental information at the above captioned dockets in response to the July 2025 Order (Supplemental Information). On September 10, 2025, the Commission's Bureau of Consumer Services (BCS) issued a Secretarial Letter (September 2025 Secretarial Letter) instructing UGI to file additional information to fully comply with the July 2025 Order. On September 22, 2025, UGI filed additional information at the above captioned dockets responding to the Commission's direction (Additional Information).

On October 6, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Office of Consumer Advocate (OCA) filed comments.<sup>1</sup> On November 10, 2025, CAUSE-PA, OCA, and UGI filed reply comments. BCS has reviewed the supplemental information filings provided by UGI and the comments/reply comments filed by the parties and determined that further information from UGI is still needed prior to the issuance of a Commission Order addressing the issues raised in this proceeding.

*Information Requested*

**UGI Gas Projected Needs Assessment**

In the July 2025 Order, the Commission directed UGI to identify eligibility factors used to calculate the number of potentially LIURP-eligible customers and provide customer numbers for each eligibility factor, broken down by the Federal Poverty Income Guideline (FPIG) level (*i.e.*, 0%-150% and 151% to 200%). July 2025 Order at 67-68.

UGI reports it is unable to break down customers by FPIG levels of 0%-150% and 151%-200%. UGI states that it evaluated customers whose usage exceeded the LIURP usage threshold and were income verified, adding that it follows the factors under 52 Pa. Code §§ 58.4(c)(1)-(4).

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<sup>1</sup> On October 28, 2025, CAUSE-PA filed an amendment to its comments. All references to "CAUSE-PA Comments" refer to the amended comments.

Supplemental Information at 23. BCS questioned UGI's inability to provide a breakdown of potentially LIURP-eligible gas customers by FPIG levels, noting that UGI clarified that this number was determined based on income-verified customers. BCS instructed UGI to provide a more detailed justification for why this information cannot be provided. September 2025 Secretarial Letter at 3.

UGI asserts that it provided a breakdown of potentially LIURP-eligible income-verified gas customers (*i.e.*, 13,780) in the 0%-150% FPIG level as part of the projected needs assessment in the Proposed 2026 USECP. UGI reports that 4,836 self-certified gas customers (*i.e.*, 151%-200% FPIG) are potentially LIURP-eligible, based on the following eligibility factors: exceeded the 877 CCF annual consumption threshold; maintained 12 consecutive months of consumption history; and has not received LIURP in the prior 7 years. Additional Information at 8.

UGI also provided an updated customer count for estimated low-income gas customers based on 2019-2023 census data.<sup>2</sup> UGI identified the eligibility factors it used to determine the customer count potentially LIURP-eligible in the 151%-200% FPIG level but did not identify the customer counts for each of the eligibility factors. Further, UGI asserts that it follows the factors in Pa. 52 § 58.4(c)(1)-(4) to identify the number of potentially LIURP-eligible low-income customers (*i.e.*, 0%-150% FPIG) but did not identify the customer counts for each of the eligibility factors.

BCS agrees with the concerns raised by CAUSE-PA and OCA regarding the accuracy of UGI Gas' projected needs assessment. CAUSE-PA Comments at 110-114 and OCA Comments at 45-47. UGI should provide further information to account for the application of the customer counts.

Therefore, UGI is directed to revise the UGI Gas customer counts in its projected needs assessment using the 2019-2023 census data to identify the following:

- Estimated number of low-income customers.
- Number of confirmed low-income customers.<sup>3</sup>
- Number of identified payment-troubled low-income customers.
- Number of potentially LIURP-eligible low-income customers:
  - Number of potentially LIURP-eligible low-income customers by each eligibility factor used to determine the number above.
  - Cost of serving the number of potentially LIURP-eligible low-income customers.
  - Enrollment size of CAP to serve all eligible customers.
- Estimated number of customers with incomes between 151%-200% FPIG.
- Number of identified customers with incomes between 151%-200% FPIG.

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<sup>2</sup> UGI's projected needs assessment in the Proposed 2026 USECP is based on 2018-2022 census data. UGI reports that the updated number of estimated low-income gas customers (*i.e.*, 0%-150% FPIG) based on 2019-2023 census data is 143,404. Supplemental Information at 23.

<sup>3</sup> Based on the definition and identification of confirmed low-income customer in UGI Gas 2025 Rate Case Settlement. *See Pa. PUC, et al. v. UGI Utilities, Inc. – Gas Division*, Docket No. R-2024-3052716, *et al.*, Joint Settlement Agreement (filed on July 9, 2025) at ¶ 67. The Commission approved the Joint Settlement Agreement in an Order entered on September 11, 2025.

- Number of potentially LIURP-eligible customers with incomes between 151%-200% FPIG:
  - Number of potentially LIURP-eligible customers with incomes between 151%-200% FPIG by each eligibility factor used to determine the number above.
  - Cost of serving the number of potentially LIURP-eligible customers with incomes between 151%-200% FPIG.

*Conclusion*

Accordingly, UGI must file and serve the revised projected needs assessment at the above-captioned dockets no later than fifteen (15) calendar days from the date of this letter. All parties to this proceeding may file comments responding to the revised projected needs assessment within 10 (ten) days after UGI's filing deadline and reply comments may be filed with 10 (ten) days thereafter. This determination has been made by BCS staff under authority delegated by the Commission. Parties have the right to seek reconsideration of this staff action. See 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

Questions may be directed to Regina Carter, [regincarte@pa.gov](mailto:regincarte@pa.gov), and Nathan Froehlich, [nfroehlich@pa.gov](mailto:nfroehlich@pa.gov).

Sincerely,



Matthew L. Homsher  
Secretary

cc: Stephen M DeFrank, Chairman  
Kimberly Barrow, Vice Chair  
Kathryn L. Zerfuss, Commissioner  
John F. Coleman, Commissioner  
Ralph V. Yanora, Commissioner  
Regina Carter, BCS  
Nathan Froehlich, BCS  
Joseph Magee, BCS  
Stephanie Wilson, Law Bureau