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File #: 198160

December 19, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Homsher:

UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) respectfully submits this letter in response to the letter filed by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) on November 26, 2025. In its letter, CAUSE-PA addressed the Supplemental Statement of Facts filed by the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”). Although the Company has fully set forth in its Statement in Support and Reply Comments why the Joint Petition for Approval of Settlement (“Settlement”) should be approved without modification, UGI Gas provides this letter to correct and address certain arguments raised in CAUSE-PA’s November 26, 2025 letter.

First, CAUSE-PA incorrectly asserts that UGI Gas “held” refunds of “over \$14,000” for “11-12 months after the March 2022 and April 2022 incidents.” (CAUSE-PA Letter, p. 2.) However, the reconnection fees were charged when the customers contacted the Company and requested a reconnection. CAUSE-PA erroneously assumes that the refunds processed on March 10, 2023, totaling \$14,593, were for reconnection charges that were assessed in March 2022 and April 2022. Indeed, as noted on page 5 of the Supplemental Statement of Facts, not every customer sought to reconnect service soon after the incidents, i.e., the \$14,593 in fees were charged at different times subsequent to the March and April 2022 events based on when customers contacted the Company to restore service. Moreover, UGI Gas worked diligently to determine which customers were affected, to contact the affected customers, and to process these refunds to customers.

Second, CAUSE-PA questions the use of the term “reverse” in the Supplemental Statement of Facts and asks for clarification on the method used to refund the reconnection fees to the affected customers. (CAUSE-PA Letter, p. 2.) To clarify, the word “reversed” appears once in the Supplemental Statement of Facts and was used to explain that customers who had been “charged a reconnect fee would have those reconnection fees reversed and credited back to them.” (Supplemental Statement of Facts, p. 5.) As such, customers with active gas service accounts had the refunds appear as credits on their gas service accounts. For customers with inactive gas service accounts at the time of the reversal, if the reversal resulted in a credit balance to their account, a refund would have been provided either in the form of a check or as a direct credit to their bank account. If the postal services returned the check to UGI Gas for deliverability issues, UGI Gas attempted to contact the customer using the contact information on file to obtain a valid mailing address.

Third, CAUSE-PA notes the Supplemental Statement of Facts’ median and average lengths of time for reconnecting service to the affected service and raises a concern with UGI Gas “omitt[ing] households that never reconnected from its reconnection statistics. (CAUSE-PA Letter, p. 3.) However, those households were properly excluded from the average and median values because after UGI Gas’s multiple attempts to reconnect service to them, those customers either declined to reconnect service or vacated the properties. Therefore, including those service addresses would have distorted the calculations and mischaracterized the length of time it took for customers to reconnect service after being impacted by the events.”

Fourth, while CAUSE-PA attempts to criticize the Company for “fail[ing] to provide an updated count of customers who remain without service,” the Commission did not direct UGI to provide that figure in the Supplemental Statement of Facts. (CAUSE-PA Letter, p. 2.) Nonetheless, UGI Gas reports that as of December 18, 2025, 75 of the service addresses have inactive service accounts.¹ Further, as stated in the Company’s Reply Comments, the Company’s understanding is that the remaining service addresses do not currently require gas service, based on its field visits to these properties.

Fifth, CAUSE-PA erroneously contends that “customer notification only occurred after inquiries from the Bureau of Consumer Services [‘BCS’], not through proactive identification and outreach by UGI.” (CAUSE-PA Letter, p. 3.) In actuality, UGI Gas began its outreach to the impacted customers **before** contacting BCS to make it aware, for the first time, about the March and April 2022 events. Specifically, UGI Gas began its corrective outreach to reconnect the impacted accounts on May 27, 2022. That same day, UGI Gas contacted BCS to make it aware of the issues and to schedule a meeting with BCS. It was not the other way around, as alleged by CAUSE-PA. Later, UGI Gas met with BCS on June 6, 2022, to explain the issues and remediation efforts that UGI was undertaking. (See Supplemental Statement of Facts, p. 7.) To clarify this issue, BCS did not know about the subject terminations until UGI Gas notified it about them.

¹ After the filing of UGI Gas’s Reply Comments, new customers established service at two of the 77 service addresses that were previously reported as having inactive gas service in the Company’s Reply Comments.

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Sixth, CAUSE-PA points to the \$17,653 that UGI Gas spent to restore service to the affected customers and argues that “[t]hese costs should be paid by UGI itself and not customers.” (CAUSE-PA Letter, p. 4.) UGI Gas clarifies that the Company will not make a claim for recovery of these costs in its next base rate case.

Finally, while CAUSE-PA reiterates its request for the Commission to “increase the penalty to no less than \$250,000 and direct proceeds to UGI’s Hardship Fund program,”² CAUSE-PA continues to disregard *Pa. PUC v. PECO Energy Co.*, which similarly involved the failure of a third-party vendor’s auto-dialer system that resulted in service terminations for customers. *See Pa. PUC v. PECO Energy Co.*, Docket No. M-2021-3014286 (Order entered Dec. 8, 2022) (“*PECO*”). As explained in UGI Gas’s Reply Comments, CAUSE-PA’s failure to address the *PECO* case is critical because although the dollar amounts in *PECO* are higher than the \$90,000 civil penalty under the Settlement in this proceeding, there were approximately 45,200 more customers affected in the *PECO* case than in the case at bar. (*See* UGI Gas Reply Comments, p. 12.) Accordingly, the Commission’s past decision in *PECO*, along with the other factors for evaluating proposed civil penalties, supports the agreed-upon \$90,000 civil penalty in this proceeding. (*See id.*)

Copies of this letter are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Attachment

cc: Office of Special Assistants (*via email; w/attachment*)
Certificate of Service

² CAUSE-PA Letter, p. 4.

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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CAUSE-PA

Dated: December 19, 2025



Devin T. Ryan

VERIFICATION

I, Daniel V. Adamo, Vice President - Customer Relations of UGI Utilities, Inc., hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 19, 2025

Signed by:
Daniel Adamo
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Daniel V. Adamo