



February 6, 2026

VIA E-MAIL

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

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

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

Dear Secretary Homsher:

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

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

Respectfully submitted,

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Counsel for CAUSE-PA

CC: Certificate of Service
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Certificate of Service

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

VIA EMAIL ONLY

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Date: February 6, 2026

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA),¹ through its counsel at the Pennsylvania Utility Law Project, submits these brief Comments pursuant to the December 22, 2025 Secretarial Letter (hereinafter, December 2025 Letter), which invited parties to this proceeding to submit comments and reply comments regarding the revised projected needs assessment, a components of the proposed Universal Service and Energy Conservation Plan (USECP) for 2026-2030 of UGI Utilities, Inc (UGI or the Company) (Proposed 2026 USECP or Plan).

On October 6, 2025, CAUSE-PA and the Office of Consumer Advocate (OCA) each submitted initial Comments in response to UGI's Proposed 2026 USECP and the issues identified in the Commission's July 2025 Order. On October 28, 2025, CAUSE-PA filed Amended Comments, correcting a minor factual error regarding the Commission's pending Low Income Usage Reduction Program (LIURP) regulations. On November 10, CAUSE-PA and the OCA each submitted Reply Comments. On December 13, 2025, the revised LIURP rules became effective upon publication in the *Pennsylvania Bulletin*, and full compliance is required within 12 months of that effective date.

On December 22, 2025, the Commission issued its December 2025 Letter citing concerns regarding the inadequacy of UGI's projected needs assessment raised by both CAUSE-PA and OCA in Comments and Reply Comments, and directing UGI to file a revised projected needs assessment by January 6, 2026. The Commission further directed that parties file Comments 10 days after UGI's revised needs assessment was filed, and that Reply Comments would be due 10 days after that. UGI requested a brief extension to file its revised needs assessment, which was granted, and timely filed its revised projected needs assessment on January 16, 2026. CAUSE-PA

also requested a brief extension to the Comment period, which was granted, and hereby submits its Comments for the Commission’s consideration in response to UGI’s revised projected needs assessment.

For the sake of brevity, unless required for context, CAUSE-PA will not reiterate the arguments and recommendations raised in its initial Comments and Reply Comments regarding UGI’s projected needs assessment, or any other aspect of its proposed USECP. CAUSE-PA stands by its initial recommendations and incorporates those arguments and recommendations by reference herein.

II. COMMENTS

A. CAUSE-PA recommends that UGI utilize its revised confirmed low income customer count to set appropriate and measurable CAP enrollment goals.

In initial Comments, CAUSE-PA noted serious concerns with the accuracy of UGI’s needs assessment.¹ Specifically, that the narrow definition UGI initially used to quantify its confirmed low income customers is inconsistent with the explicit definition of that term and results in a circular needs assessment – permitting UGI to assess the *need* for assistance based only on the number of customers that already participate in UGI’s programs. CAUSE-PA also noted that, in the 2025 UGI Gas Base Rate Case Settlement, UGI agreed to modify its definition of “confirmed low income customers” to include all households for which UGI has information that would make it “reasonably likely” that the household has income at or below 150% FPL,² consistent with the Commission’s definition of the term in sections 62.2 and 69.262 of the Pennsylvania Code.³ That definition should include customers that have been identified through

¹ UGI Utilities, Inc. Universal Service and Energy Conservation Plan for 2026-2030, Docket Nos. M-2025-3054362, et al., CAUSE-PA Comments at 112.

² CAUSE-PA Comments at 111.

³ Id., citing 52 Pa. Code 62.2, 69.262.

any of the following criteria, 1) self-certification, 2) 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 3) receipt of a LIHEAP grant in the prior 12 months.⁴

The December 2025 Letter directed UGI to update its projected needs assessment using 2019-2023 Census data to identify, *inter alia*, the number of estimated and confirmed low income customers based on 2019-2023 Census data and the definition of confirmed low-income customer agreed to in UGI Gas 2025 Rate Case Settlement, respectively.⁵

UGI's revised projected needs assessment now identifies 68,697 confirmed low income gas customers, which UGI states is consistent with the Company's definition of Confirmed Low Income as agreed to in Paragraph 67(a)(i-iii) of the aforementioned rate case settlement. The revised needs assessment also now identifies 143,404 estimated low income customers based on the 2019-2023 American Community Survey 5-Year Estimates - United States Census Bureau provided by the Bureau of Consumer Services.⁶

CAUSE-PA is satisfied with UGI's revised estimated and confirmed low income customer counts and believes that it more accurately represents the scope of low income households in need of assistance in UGI's service territory. Now that UGI has filed its updated needs assessment, as recommended in our initial comments,⁷ CAUSE-PA recommends that the Commission direct UGI to set reasonable and measurable goals to improve its CAP enrollment. Specifically, CAUSE-PA recommends that the Commission direct UGI to set enrollment targets at 20% per year of its

⁴ *Id.*; Joint Petition for Approval of Settlement of All Issues, Docket No. R-2024-3052716, (Filed July 9, 2025) at ¶ III.3.67(b), Final Order approving the Joint Petition for Settlement without modification issued September 11, 2025.

⁵ December 2025 Letter at 2, FN 3.

⁶ UGI Revised Projected Needs Assessment.

⁷ UGI Utilities, Inc. Universal Service and Energy Conservation Plan for 2026-2030, Docket Nos. M-2025-3054362, et al., CAUSE-PA Comments at 112.

estimated low income customer count until the Company reaches at least 75% enrollment of this estimated group.

Second, UGI should be required to establish quantitative goals related to affirmative customer outreach for the purpose of enrolling low income customers in CAP. This affirmative outreach should include telephone contacts, mailings, and forms of electronic communication (with customer consent). UGI should also be directed to work with its Universal Service Advisory Committee (USAC) in developing these goals and outreach materials and should be required to track and report relevant data regarding its progress to the USAC.

As stated in our initial Comments, adoption of the appropriate definition of confirmed low income customers is a good first step in obtaining an accurate assessment of UGI's low income population, and UGI has now updated its needs assessments based on the correct CLI definition. However, the underlying purpose of improved identification of low income households, and more precise assessment of need, is to ensure that assistance is actually reaching households in need. By setting concrete goals around enrollment and outreach, the Commission would help ensure that UGI has a plan to reasonably address the accessibility of UGI's programs designed to assist its low income customer population.

B. CAUSE-PA recommends that UGI's revised projected LIURP needs assessment be utilized to establish appropriate participation goals.

In initial Comments, CAUSE-PA noted that UGI's LIURP needs assessment referenced the factors in the now-former Section 58.4(c)(1)-(4), but did not provide further information necessary to independently evaluate UGI's assertion that it properly assessed the regulatory factors.⁸ In its December 2025 Letter, the Commission also noted that UGI referenced the LIURP

⁸ *Id.* at 113.

regulations, but did not identify the customer counts for each of the factors.⁹ The Commission then directed UGI to update its projected gas LIURP needs assessment to indicate, *inter alia*, the number of potentially LIURP-eligible low-income customers by each eligibility factor used.¹⁰

UGI's revised projected needs assessment provides further detail regarding certain factors used to establish the number of households potentially eligible for LIURP, including months of consecutive usage, whether the household has usage of 877 ccf, and whether the household has been weatherized in the past seven years. UGI also provided this information segmented between households with income at 0-150% FPL and households with income at 151-200%, as requested by the Commission. Using these factors, UGI has identified 32,747 potentially LIURP eligible gas customers. Based on the average cost of a LIURP job (\$7,249), it would cost approximately \$237,373,003 to reach all potentially eligible customers and, based on UGI's projected yearly enrollment estimates of 500 gas LIURP jobs per year,¹¹ it would take approximately 65 years to reach all estimated eligible households.

It is unclear from the Commission's December 2025 Letter whether it was anticipating that UGI would address the factors outlined in the current regulation at section 58.4(c), final and effective as of December 13, 2025, or the previous version of section 58.4(c). The previous version of section 58.4(c) outlined the following factors: 1) the number of eligible customers, taking into consideration those who have already received services and those who are not in need in usage reduction services, 2) expected customer participation rates based on historical participation rates, 3) the total expense of providing those services, and 4) a plan for providing program services within a reasonable period of time.¹² UGI appears to have met the criteria

⁹ December 2025 Letter at 2.

¹⁰ Id.

¹¹ Proposed 2026-2030 USECP at A-2, Table A-3.

¹² 52 Pa. Code §58.4(c)(1)-(4), replaced December 13, 2025.

outlined in former 58.4(c), with the exception of having a plan for providing program services *within a reasonable period of time*.

CAUSE-PA submits that it is unreasonable to set projected enrollment levels at a pace that will not reach all eligible customers until 2091 – 65 years from the date of UGI’s needs assessment. Indeed, this is not a “reasonable period of time” as contemplated in section 58.4(c) of the Commission’s prior regulations nor its current regulations.¹³ Nevertheless, while CAUSE-PA is able to conclude that the current 65 year trajectory for reaching all eligible customers is patently unreasonable, it is not able to determine what constitutes a reasonable period of time without more factual information and data.

In addition to setting LIURP budgets at a level sufficient to reach a prescribed percentage of eligible households within a specific time frame, that budget should also take into account increasing costs and inflation, so that a budget does not *decrease* in reach and efficacy over time. A LIURP budget should also take into account both distribution rate increases and commodity cost increases. Other issues requiring further analysis stem from the revised LIURP regulations, including sufficient outreach and budget to meet the special needs population, and addressing re-weatherization timeframes, de facto heating households, payback periods, and incidental and health and safety budgets.

Given the complexity of the issue, and the need for further factual information to fully assess the reasonableness of projected enrollment levels and a 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. In addition, that factual record should be developed based on the *current* LIURP regulations. Under the current 58.4(c)(1)-(8), additional

¹³ 52 Pa. Code 58.4(c) (prior and current).

factors are to be considered, including the number of estimated low income households and confirmed low income households broken down by income tier (0-50% FPL, 51-100% FPL, 101%-150% FPL, and 151-200% FPL), the number of special needs customers that could be provided services, and a plan for providing services to eligible customers within a reasonable period of time, with consideration given to the capacity of Energy Service Providers (ESP) necessary for provision of services.¹⁴

In its initial Comments, OCA recommended that the Commission develop a process for UGI (and all gas and electric utilities) to provide information at least every two years demonstrating that its LIURP budget is sufficient and that it accounts for any changes that occur (including intervening rate increases).¹⁵ While not opposed to that structure and time frame for review, CAUSE-PA believes that, with the new LIURP regulations coming into effect, a new paradigm is needed with respect to what time-frame, and accordingly what budget level, is reasonable to ensure that this necessary assistance gets to Pennsylvania's eligible customers.

III. CONCLUSION

CAUSE-PA thanks the Commission for its thoughtful consideration of the issues and recommendations raised above and in CAUSE-PA's Comments regarding UGI's revised needs assessment. We urge the Commission to act in accordance with CAUSE-PA's Comments and Reply Comments in this proceeding to ensure that all customers – regardless of income – are able to access safe, affordable service within UGI's service territory.

¹⁴ 52 Pa. Code 58.4(c)(1)-(8).

¹⁵ OCA Comments at 43.

Respectfully Submitted,



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