

COMMONWEALTH OF PENNSYLVANIA



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February 6, 2026

Via Electronic Filing

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

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

Dear Secretary Homsher:

Enclosed for electronic filing in this proceeding, please find the Comments of the Office of Consumer Advocate in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
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Enclosures

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Certificate of Service

CERTIFICATE OF SERVICE

UGI Utilities, Inc. Universal Service and
Energy Conservation Plan for 2026-2030

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

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 6th day of February 2026.

SERVICE BY E-MAIL ONLY

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Dated: February 6, 2026

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

UGI Utilities, Inc. – Gas Division :
Universal Service and Energy :
Conservation Plan for 2026-2030 : Docket No. M-2025-3054362

UGI Utilities, Inc. – Electric Division :
Universal Service and Energy :
Conservation Plan for 2026-2030 : Docket No. M-2025-3054366

UGI Utilities, Inc. – Gas Division :
Petition for Limited Waiver of 52 Pa. :
Code : Docket No. P-2025-3054381

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

I. INTRODUCTION

On April 1, 2025, UGI Utilities, Inc. (UGI Gas or Company) filed its 2026-2030 USECP (Proposed 2026-2030 USECP) at the above-captioned dockets.¹ 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

¹ Although UGI references both the UGI Gas and UGI Electric universal services programs in its Proposed 2026-2030 USECP, the Needs Assessment referenced here only addresses UGI Gas.

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 Office of Consumer Advocate (OCA) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed Comments. On November 10, 2025, CAUSE-PA, OCA, and UGI filed reply comments.

On December 22, 2025, the Commission issued a Secretarial Letter that directed UGI to revised the customer counts in its projected needs assessment using the 2019-2023 census data to identify: (1) the estimated number of low-income customers; (2) number of confirmed low-income customers; (3) number of identified payment-troubled customers; (4) number of potentially LIURP-eligible customers; (5) estimated number of customers with incomes between 151-200% FPIG; (6) number of identified customers with incomes between 151-200% FPIG; and (7) number of potentially LIURP-eligible customers with incomes between 151-200% FPIG.

On January 16, 2026, UGI Gas filed its Revised Table B-1 Projected Needs Assessment for UGI Gas with supporting information about the itemized numbers. Comments were to be filed within 10 days after the revised needs assessment. On January 23, 2026, CAUSE-PA filed a letter requesting an extension, and on January 26, 2026, the Commission issued a Secretarial Letter extending the deadline for the submission of Comments until February 6, 2026.

II. COMMENTS

The OCA has reviewed the Company's proposed revised needs assessment and requests that the Company provide further clarification regarding how it calculated the proposed numbers included in the needs assessment.

A. Use of the 2019-2023 American Community Survey

UGI states that the number of estimated low-income customers is based on the 2019-2023 American Community Survey from the Census Bureau. UGI provides:

Number of Estimated Low Income Customers is based on the 2019-2023 American Community Survey 5-Year Estimates - United States Census Bureau that is provided by the Bureau of Consumer Services annually. The 151-200% FPIG was calculated by subtracting the number of households at 150% from the number of households at 200% in UGI's franchised service area.

Revised Table B-1 Projected Needs Assessment for UGI Gas at 1. In its explanation, the Company does not specifically indicate what Table was used. It is the OCA's understanding of the ACS information that the ACS does not report households using the range of Federal Poverty Level. It is the OCA's understanding that the table reports the population by FPL range (Table C17002), or the number of adults by FPL range (Table B17024). The OCA would request that the Company provide further information regarding how it used the ACS data.

B. The OCA Seeks Clarification Regarding Why There are Differences Between the Revised Table B-1 Projected Needs Assessment for UGI and the 2024 BCS Report.

The OCA identified differences in the number of customers identified in the revised needs assessment and in the recently released 2024 BCS Report.² The OCA seeks clarification regarding the reasons for the differences in the numbers proposed.

1. Estimated Low-Income Customers

In the Revised Table B-1 Projected Needs Assessment for UGI Gas, the Company states that its estimated low-income population is 143,404. Revised Table B-1 Projected Needs Assessment at 1. The 2024 BCS Report states that UGI's estimated low-income number was

² 2024 Bureau of Consumer Services Universal Services and Collections Performance Report (2024 BCS Report), <https://www.puc.pa.gov/media/3771/2024-universal-service-report-final.pdf> (Last accessed January 26, 2026).

153,045 in 2024 and 166,336 in 2023. 2024 BCS Report at The OCA requests that the Company provide clarification regarding why there is a difference in the numbers.

2. Confirmed Low-Income Customers

In the Revised Table B-1 Projected Needs Assessment for UGI Gas, the Company states its “confirmed low-income” customer number is 68,867. Revised Table B-1 Projected Needs Assessment at 1. In the 2024 BCS report, UGI reported that its confirmed low-income was 88,897 in 2024 and 89,923 in 2023. 2024 BCS Report at 6. The OCA requests that the Company provide clarification regarding why there is a difference in the number of confirmed low-income customers.

3. Payment-Troubled Low-Income Customers

In the Revised Table B-1 Projected Needs Assessment for UGI Gas, the Company identifies the number of payment-troubled low-income customers is 7,258. Revised Table B-1 Projected Needs Assessment at 1. The 2024 BCS Report provides that UGI Gas’s number of payment-troubled low-income customers was 18,002 in 2024 and 19,270 in 2023. 2024 BCS Report at 8. The OCA requests that the Company provide clarification regarding why there is a difference between the revised needs assessment and the 2024 BCS Report. The OCA also requests clarification regarding why the number of payment troubled low-income customers dropped significantly from the number identified in 2023 and 2024.

C. The OCA Seeks Clarification Regarding the Qualifications for Inclusion in Line 6, Enrollment Size to Serve All Eligible Customers.

In the Revised Table B-1 Projected Needs Assessment for UGI Gas, the number of “confirmed low-income households” in Line 2, 68,867 household, is slightly different than the “enrollment size to serve all eligible customers” in Line 6, or 68,687 households. Revised Table B-1 Projected Needs Assessment at 1. The OCA requests clarification regarding whether there is

a difference in these populations, and if there is, why the “enrollment size to serve all eligible customers” would be lower than the number of confirmed low-income customers.

In addition, the OCA requests clarification regarding why the enrollment size of CAP to serve all eligible customers is equal to the number of confirmed low-income customers rather than equal to the number of eligible low-income customers. The OCA does not understand why the population of eligible customers would be limited to confirmed low-income customers. The OCA requests that the Company provide clarification regarding what makes an "estimated low-income" customer not "eligible for" enrollment in CAP.

III. CONCLUSION

The OCA appreciates the opportunity to provides comments on UGI’s Revised Table B-1 Projected Needs Assessment for UGI Gas. The OCA respectfully requests that UGI Gas provide the above-requested clarifications to its Revised Table B-1 Projected Needs Assessment for UGI Gas.

Respectfully submitted,

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DATED: February 6, 2026

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