UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517

May 6, 2026

VIA E-FILING

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

RE: **Amended - Annual Electric System Reliability Report (Public)**
3 Years Ending December 31, 2025
Docket No. M-2023-3039027

Dear Secretary Homsher,

UGI Utilities, Inc. - Electric Division ("UGI") filed its 2025 Annual Electric System Reliability Report on April 30, 2026. In order to comply with a request from the Commission to include a copy of UGI's emergency load control procedures with the annual report, UGI hereby files this amended annual report which includes such procedures as an appendix to be kept on file by the Commission per 52 Pa. Code § 57.52(a)(2)(b)(3).

UGI is serving a copy of this amended filing to each of the Office of Consumer Advocate, the Office of Small Business Advocate, the Bureau of Audits, and the Bureau of Technical Utility Services.

Questions related to the attached report can be directed to Kyle Stair at (570) 407-2641 or kstair@ugi.com.

Sincerely,

Vincent Degiusto
UGI Utilities, Inc.
Senior Director - Electric Division

Attachments
Appendix

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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).

VIA ELECTRONIC MAIL

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UGI Utilities, Inc. – Electric Division
Annual System Reliability Report
2025

PUBLIC

April 30, 2026

UGI Utilities, Inc. – Electric Division
2025 Electric Service Reliability Annual Report

§ 57.195(b)(1) – An overall current assessment of the state of the system reliability in the [Electric Distribution Company's] ("EDC's") service territory including a discussion of the EDC's current programs and procedures for providing reliable electric service.

For the twelve- (12-) month period ending December 2025, UGI Utilities, Inc. – Electric Division's ("**UGI**" or "**Company**") System Average Interruption Duration Index- ("**SAIDI**") was 97 minutes. This is below its twelve- (12-) month benchmark of 140 minutes and below the standard of 256 minutes. UGI's System Average Interruption Frequency Index ("**SAIFI**") for the twelve- (12-) month period was 0.58, which is below its twelve- (12-) month benchmark of 0.83 and below the twelve- (12-) month standard of 1.12. UGI's Customer Average Interruption Duration Index ("**CAIDI**") was 97 minutes for this same twelve- (12-) month period. This is also below its twelve- (12-) month benchmark of 169 minutes and below the twelve- (12-) month standard of 228 minutes. For the 2025 reporting period, UGI achieved satisfactory results for all benchmark metrics. The Company experienced no major events over the rolling 12-month period.

Providing reliable service is not a program unto itself, but rather it is an inherent part of every element of the service delivery process. Each segment of service delivery, including system design, construction, and operation and maintenance, includes service reliability as a primary objective.

System Design

System design is fundamental to providing reliable electric service. To that end, UGI has incorporated service reliability into all aspects of its system design. Planning standards, construction standards, component selection, engineering, engineering training, engineering instructions and Supervisory Control and Data Acquisition ("**SCADA**") integration programs all have service reliability as a fundamental consideration.

Construction

No matter how well an electrical system is designed, its components must be properly assembled for it to function as intended. UGI's construction personnel possess the knowledge and skills necessary to effectively perform their duties. Post-construction inspection programs assure that additions and improvements to the system are completed properly.

Operation

A continuously staffed operations control center is in place to assure quick response to interruptions on the delivery system. The operations control center is staffed by system operators who diagnose system problems and mount a rapid and appropriate response to trouble on the system.

There are service/line personnel on duty at the distribution operations center from 7:00 a.m. to 7:30 p.m. weekdays and on Saturdays 7:00 a.m. to 3:00 p.m. In addition, an overnight trouble truck provides coverage from 9:00 p.m. to 5:30 a.m. on weekdays. a

second shift trouble-truck position provides extended coverage until 11:30 p.m. on weekdays. Call-out rosters are in place to mobilize staff resources when service/line personnel are not on duty or when additional resources are required.

UGI utilizes an outage management system ("**OMS**") to assist with identification and response to electric system outages. The OMS enables UGI to collect and store information on system interruptions including cause, frequency, and location. The information accumulated in the OMS serves as the basis for determining UGI's reliability metrics and is analyzed to identify equipment failure trends and outage clusters. This same information is also used to identify system deficiencies and allocate resources for maintenance and/or system upgrades.

UGI continues to expand its Distribution SCADA ("**DSCADA**"), which provides additional system performance visibility and awareness. The DSCADA acquires and historizes distribution data and controls distribution devices from the operations center. These devices have added an increased level of protection to its distribution system and have been utilized to prevent sustained interruptions and restore customers through remote switching.

Maintenance

UGI has inspection and maintenance ("**I&M**") programs in place to monitor all equipment on its system and address any problems identified through these programs. UGI found no significant system equipment issues while implementing the 2025-2026 Biennial I&M Plan, approved by the Pennsylvania Public Utility Commission ("**PUC**" or "**Commission**") on November 2, 2023.

Also of note, in addition to the vegetation management program outlined in the Biennial I&M Plan, the Company continues operating at an elevated resource level to increase hazard tree removals and reduce the current circuit trimming cycle.

§ 57.195(b)(2) – A description of each major event that occurred during the year being reported on, including the time and duration of the event, the number of customers affected, the cause of the event and any modified procedures adopted to avoid or minimize the impact of similar events in the future.

52 Pa. Code §57.192 defines a major event:

(i) Either of the following:

(A) An interruption of electric service resulting from conditions beyond the control of the EDC which affects at least 10% of the customers in the EDC's service territory during the course of the event for a duration of 5 minutes each or greater. The event begins when notification of the first interruption is received and ends when service to all customers affected by the event is restored.

(B) An unscheduled interruption of electric service resulting from an action taken by an EDC to maintain the adequacy and security of the electrical system, including emergency load control, emergency switching and energy conservation procedures, as described in §57.52 (relating to emergency load control and energy conservation by electric utilities), which affects at least one customer.

(ii) The term does not include scheduled outages in the normal course of business or an electric distribution company's actions to interrupt customers served under interruptible rate tariffs.

Major Events

UGI experienced no Major Events during the period of January 1st, 2025, to December 31st, 2025.

§ 57.195(b)(3) – A table showing the actual values of each of the reliability indices (SAIFI, CAIDI, SAIDI, and if available, MAIFI) for the EDC's service territory for each of the preceding 3 calendar years. The report shall include the data used in calculating the indices, namely the average number of customers served, the number of sustained customer minutes interruptions, the number of customers affected and the minutes of interruption.

The reliability results for UGI's service area over the last three (3) years are as follows:

2023 – 2025 Reliability Statistics

	SAIDI	SAIFI	CAIDI
3-Year Avg. Standard	**170**	**0.91**	**186**
UGI 3-Year Rolling Average	74	0.64	116

	SAIDI	SAIFI	CAIDI
12-Month Standard	**256**	**1.12**	**228**
12-Month Benchmark	**140**	**0.83**	**169**
2023 UGI Results	61	0.54	112
2024 UGI Results	107	0.78	138
2025 UGI Results	56	0.58	97

The three- (3-) year rolling average for SAIFI, SAIDI and CAIDI are performing within the three- (3-) year average standard established by the Commission Order at Docket No. M-00991220 on May 7, 2004**.**

Data necessary to calculate a Momentary Average Interruption Frequency Index ("**MAIFI**") is not available for UGI's service area.

Reliability Metrics Data

	Raw Data				Reported Indices		
	SI	**TCI**	**TCB**	**TMCI**	**SAIDI**	**SAIFI**	**CAIDI**
Jan-23	31	5,470	62,428	507,155	8	0.09	93
Feb-23	32	2,951	62,650	632,356	10	0.05	214
Mar-23	45	1,829	62,598	284,612	5	0.03	156
Apr-23	58	3,510	62,423	275,427	4	0.06	78
May-23	34	3,250	62,435	363,679	6	0.05	112
Jun-23	65	4,540	62,388	454,974	7	0.07	100
Jul-23	63	2,251	62,371	353,739	6	0.04	157
Aug-23	57	1,918	62,405	216,667	3	0.03	113
Sep-23	30	2,940	62,470	341,292	5	0.05	116
Oct-23	41	1,469	62,383	152,287	2	0.02	104
Nov-23	23	1,088	62,374	56,421	1	0.02	52
Dec-23	33	2,656	62,422	142,372	2	0.04	54
2023 TOTAL	512	33,872	62,446*	3,780,981	61	0.54	112
Jan-24	84	3,184	62,232	457,166	7	0.05	144
Feb-24	32	941	62,681	108,675	2	0.02	115
Mar-24	46	3,673	62,723	424,850	7	0.06	116
Apr-24	39	3,051	62,627	291,633	5	0.05	96
May-24	37	4,422	62,589	301,464	5	0.07	68
Jun-24	143	9,505	62,626	2,359,094	38	0.15	248
Jul-24	37	478	62,722	65,792	1	0.01	138
Aug-24	53	4,460	62,659	584,352	9	0.07	131
Sep-24	32	3,172	62,609	435,007	7	0.05	137
Oct-24	29	730	62,659	90,079	1	0.01	123
Nov-24	90	6,851	62,740	960,514	15	0.11	140
Dec-24	37	8,173	62,743	634,933	10	0.13	78
2024 TOTAL	659	48,640	62,634*	6,713,559	107	0.78	138
Jan-25	34	2,121	62,706	321,868	5	0.03	152
Feb-25	22	2,581	62,797	284,518	5	0.04	110
Mar-25	26	4,762	62,911	559,990	9	0.08	118
Apr-25	43	1,258	62,737	270,204	4	0.02	215
May-25	37	8,174	62,758	339,835	5	0.13	42
Jun-25	57	2,322	62,430	339,766	5	0.04	146
Jul-25	58	2,462	62,681	375,702	6	0.04	153
Aug-25	26	380	62,685	64,658	1	0.01	170
Sep-25	31	4,103	62,685	211,354	3	0.07	52
Oct-25	43	2,674	62,685	206,090	3	0.04	77
Nov-25	66	2,576	62,685	158,405	3	0.04	61
Dec-25	51	2,698	62,685	375,894	6	0.04	139
2025 TOTAL	494	36,111	62,704*	3,508,284	56	0.58	97
3-YEAR AVERAGE	555	39,541	62,595	4,667,608	74	0.64	116

* annual arithmetic average

SI: **System Interruptions**
TCI: **Total Customers Interrupted**
TCB: **Total Customer Base**
TMCI: **Total Minutes Customer Interrupted**

§ 57.195(b)(4) - A breakdown and analysis of outage causes during the year being reported on, including the number and percentage of service outages, the number of customers interrupted, and customer interruption minutes categorized by outage cause such as equipment failure, animal contact, tree related, and so forth. Proposed solutions to identified service problems shall be reported.

Outage by Cause
January 2025 through December 2025

OUTAGE CAUSE	% OF TOTAL INCIDENTS	NUMBER OF INTERRUPTIONS	CUSTOMERS INTERRUPTED	MINUTES INTERRUPTED
Animal	15.18%	75	2,457	111,648
Company Agent	1.42%	7	1,214	11,448
Construction Error	0.81%	4	63	4,651
Customer Problem	0.00%	0	0	0
Dig In	1.01%	5	39	13,470
Equipment Failure	19.43%	96	8,200	345,677
Lightning	0.40%	2	19	2,461
Motor Vehicle	3.85%	19	2,832	305,045
Other	2.23%	11	3,842	180,997
Public	2.23%	11	1,477	48,712
Structure Fire	0.81%	4	64	5,313
Trees	47.17%	233	15,112	2,336,476
Unknown	4.66%	23	685	126,006
Weather Related	0.81%	4	107	16,380
TOTAL	**100.00%**	**494**	**36,111**	**3,508,284**

Proposed Solutions to Identified Problems:

The largest contributor to the number of outage incidents, customers interrupted, and customer minutes interrupted on UGI's system, and primary target areas for UGI's continued improvement and investment, are tree-related outages. As seen in the table above, these account for 47% of incidents, 42% of customer interruptions (**"CI"**), and 67% of customer minutes interrupted (**"CMI"**). Weather has also been identified as a significant driver for vegetation related outages. Of total vegetation related outages in 2025, weather was identified as an initiating factor for 43% of incidents, 57% of CI, and 67% of CMI. Further analysis shows that customers served in some of the more rural and isolated areas of the UGI system have been impacted most significantly by multiple and extended outages. To address ongoing vegetation efforts including work to reduce trim cycle lengths, UGI has maintained an elevated level of vegetation management work and

associated spend which includes danger tree removal programs across the system. UGI also continues to focus on reliability prioritized line relocations and construction of remote tie-lines where appropriate. Over the last several years, UGI has maintained an increased vegetation management budget which has provided for additional vegetation resources and more specialized equipment. The goal of the increased vegetation management budget is to supplement and/or reduce regular trim cycle intervals as currently outlined in the UGI Biennial I&M plan and remove more dangerous trees across the UGI system.

Equipment failures have been identified as a leading contributor to UGI's reliability indices. The largest contributors to equipment failures in 2025 were distribution transformers, which account for 34% of total failures, and cut-outs, which account for 25% of total failures. Regarding distribution transformers, UGI continues inspecting units according to the UGI Biennial I&M plan and replacing them as deterioration or other issues are found. The Company also regularly analyzes loading on distribution transformers to identify and correct overloaded conditions before failures occur. To mitigate failures of distribution cut-out type components, UGI continues accelerated replacement of porcelain devices which has been found to be a common factor in most cut-out equipment failures. The Company has strategized an approach to replace porcelain devices by prioritizing those that would result in the greatest impact to customers in the event of a failure. Addressing other equipment failures, UGI continues an accelerated replacement of other aging infrastructure on the distribution system through the LTIIP, such as underground cable and wood poles replacements. These programs address significant long-term reliability factors, are expected to improve overall system reliability, and will smooth out historical weather-related variability to some extent.

Animal-caused outages remain a large contributor to outage instances although these instances account for a small percentage of CI and CMI. Animal-caused outages declined from the previously reported values of 103 instances in 2022, 113 instances in 2023, and 84 instances in 2024. The 75 outage instances in 2025 now falls below the average for the previous five years from 2020-2024 which was 90.4. To mitigate these types of outages, UGI has increased animal protection in substation yards and has also re-

evaluated its substation animal protection standards to include enhanced mitigation measures. The distribution animal protection standards have also been reviewed and are in line with industry standards. New and additional animal protection equipment continues being reviewed and implemented.

UGI has identified opportunities to reduce the duration and extent of outages originating from all outage causes using technology-based solutions and additional circuit sectionalizing. The Company continues to increase sectionalizing capabilities and prepare the distribution network to accommodate a future FLISR system that can self-heal by isolating faulted line sections and restoring the undamaged portions, leading to fewer customer interruptions. In the beginning of FY2024, the Company acquired a FLISR controller to begin integrating in three-phase reclosers and run a small-scale pilot to test the technology. Work on this project continued in 2025 and is ongoing. Remote control capability also continues being integrated into existing transmission Motor Operated Air-Breaks to allow expedited sectionalizing and recovery of the transmission system following disturbances. UGI continues to expand the number of devices available in the distribution SCADA system which allows System Operators to monitor and control an expanding number of devices across the UGI system.

§ 57.195(b)(6) - A comparison of established transmission and distribution inspection and maintenance goals/objectives versus actual results achieved during the year being reported on. Explanations of any variances shall be included.

Outside Plant Inspection and Maintenance Goals - Fiscal Year ("FY") 2025

CONFIDENTIAL

§ 57.195(b)(7) - A comparison of budgeted versus actual transmission and distribution operation and maintenance expenses for the year being reported on in total and detailed by the EDC's own functional account code or FERC account code as available. Explanations of any variances 10% or greater shall be included.

Operation and Maintenance Expense - FY2025

CONFIDENTIAL

§ 57.195(b)(8) - A comparison of budgeted versus actual transmission and distribution capital expenditures for the year being reported on in total and detailed by the EDC's own functional account code or FERC account code as available. Explanations of any variances 10% or greater shall be included.

Capital Expenditures – FY2025

CONFIDENTIAL

§ 57.195(b)(9) - Quantified transmission and distribution inspection and maintenance goals/objectives for the current calendar year detailed by system area (that is, transmission, substation and distribution).

Outside Plant Inspection and Maintenance Goals - FY2026

CONFIDENTIAL

§ 57.195(b)(10) - Budgeted transmission and distribution operation and maintenance expenses for the current year in total and detailed by the EDC's own functional account code or FERC account code as available.

Operation and Maintenance Expense - FY2026

CONFIDENTIAL

§ 57.195(b)(11) – Budgeted transmission and distribution capital expenditures for the current year in total and detailed by the EDC's own functional account code or FERC account code as available.

Capital Expenditures - FY2026

CONFIDENTIAL

§ 57.195(b)(12) – Significant changes, if any, to the transmission and distribution inspection and maintenance programs previously submitted to the Commission.

There were not any significant changes during 2025 to the transmission and distribution inspection and maintenance programs outlined in previous reports submitted to the Commission. Starting January 1, 2011, all UGI distribution system equipment is being inspected and maintained consistent with UGI's Bi-Annual Inspection and Maintenance Plan as filed with the Commission.

APPENDIX

UGI Utilities Inc. Electric Division
Emergency Load Control and Energy Conservation Procedure

In accordance with 52 Pa. Code § 57.52 - Emergency load control and energy conservation by electric utilities, UGI Utilities Inc, Electric Division has established the following procedure to outline response to load control and/or energy conservation on the electric distribution system.

Emergency Load Control

A load emergency situation exists whenever:

(A) The demands for power on all or part of the utility's system exceed or threaten to exceed the capacity then actually and lawfully available to supply the demands.

(B) System instability or cascading outages could result from actual or expected transmission overloads or other contingencies.

(C) The conditions exist in the system or another public utility or power pool with which the utility's system is interconnected and cause a reduction in the capacity available to the utility from that source or threaten the integrity of the utility's system.

In this case, the utility shall take the reasonable steps as the time available permits to bring the demands within the then-available capacity or to otherwise control load. The steps shall include, but are not limited to, reduction or interruption of service to one or more customers, in accordance with the utility's procedures for controlling load.

Emergency Energy Conservation

An emergency energy conservation situation exists whenever events result or, in the judgment of the utility, threaten to result in a restriction of the fuel supplies available to the utility or its energy vendors, so that the amount of electric energy which the utility is able to supply is or will be adversely affected. In the event of an emergency energy conservation situation, the utility shall take reasonable measures that it believes necessary and proper to conserve available fuel supplies. The measures may include, but are not limited to, reduction, interruption or suspension of service to one or more of its customers or classes of customers in accordance with the utility's procedure for emergency energy conservation.

Roles and Responsibilities

PJM is responsible for declaring the existence of an Emergency, and for directing the operations of UGI and all other PJM Members as necessary to manage, alleviate, or end an Emergency. PJM also is responsible for transferring energy on the PJM Members' behalf to resolve an Emergency. PJM is also responsible for executing agreements with other Control Areas interconnected with the PJM RTO for the mutual provision of service to meet an Emergency. Emergency levels are broken down into the following categories:

- Advisory – issued one or more days in advance of the operating day. General in nature and for elevated awareness only. No preparations required.
- Alerts – issued one or more days in advance of the operating day for elevated awareness and to give time for advanced preparations.
- Warnings – issued real-time, typically preceding, and with an estimated time/window for, a potential future Action.
- Actions – issued real-time and requires PJM and/or Member Response.
    - These actions are consistent with NERC EOP standards.

UGI strives to meet customer energy demands either through the use of available generating resources, power purchases from PJM Members, or through the use of planned load management programs. If customer demand cannot be met, PJM will direct Emergency actions, such as voltage reductions, and as a last resort, manual load shed.

During constrained operations, UGI will jointly, with other PJM Members, implement Emergency Procedures up to the point of a Manual Load Shed Action. Prior to the implementation of a Manual Load Shed Action, PJM dispatch will review each PJM Control Zone energy / reserves calculation to determine their relative level of capacity deficiency (reserves evaluated via PJM EMS system). If all PJM Control Zones are capacity deficient, Manual Load Shed Actions will be implemented proportionally, based on the level of shortage, otherwise only the deficient Control Zones will be required to shed load.

Transmission constraints may result in PJM dispatch implementing emergency procedures, including load shed, on a Control Zone specific basis or a subset of a Control Zone.

UGI Electric Load Reduction Procedures

Curtailment of Non-Essential Building Load

UGI Actions:

- Notify the Building Superintendent to curtail all nonessential light and power at UGI facilities
- Enter event in Daily System Operator log.
- Notify Manager System Operations, who will notify personnel deemed appropriate based on the nature of the event.

Voltage Reduction Action

The purpose of Voltage Reduction during capacity deficient conditions is to reduce voltage on the distribution system in order to provide a sufficient amount of reserve to maintain tie flow schedules and preserve limited energy sources. It is implemented when load relief is still needed to maintain tie schedules.

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UGI Actions:

- Initiate voltage reduction. Reduce voltage at Mountain Substation to 62700 for a 5 percent voltage reduction
- Ensure that System Operations is staffed with two System Operators. Consult with the Manager of System Operations.
- Enter event in Daily System Operator log.
- Notify Manager System Operations, who will notify personnel deemed appropriate based on the nature of the event.
- Notify the Pennsylvania Public Utility Commission (PAPUC)

Manual Load Shed Action

The Manual Load Shed is an Operating Instruction from PJM to shed firm load when the PJM RTO cannot provide adequate capacity to meet the PJM RTO's load and tie schedule, or critically overloaded transmission lines or equipment cannot be relieved in any other way.

UGI Actions:

- Promptly shed an amount of load equal to or in excess of the amount requested by the PJM Dispatcher within 5 minutes of the issued directive. Maintain the requested amount of load relief until the load transmission shed order is cancelled. See Attachment K: PJM Load Shed Directive Procedure
- Notify PJM of the amount of load curtailed.
- Ensure that System Operations is staffed with two System Operators. Consult with the Manager of System Operations
- Notify company management of the emergency procedure, Notification Sequence.
- The PJM System Operator Subcommittee will consider the use of public appeals to conserve electricity usage and consider the use of public announcement of the emergency. Notify the UGI System Operator Subcommittee representative whenever a PJM SOS conference call is scheduled.
- Notify the Pennsylvania Utility Commission (PAPUC).

Post Contingency Local Load Relief Warning

The purpose of the Post Contingency Local Load Relief Warning is to provide advance notice to a Transmission Owner(s) of the potential for manual load shed in their area(s). It is issued after all other means of transmission constraint control have been exhausted or until sufficient generation is on-line to control the constraint within designated limits and timelines as identified in PJM Manual 3 Transmission Operations, Section 2 – Thermal Operating Guidelines.

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UGI Actions:

- Review company procedures and be prepared to shed load in the amount requested.
- Reinforce internal communications so that load shedding will occur with minimum delay.
- Promptly shed an amount of load equal to or in excess of the amount requested by the PJM Dispatcher and maintain the requested amount of load relief until the load shed order is cancelled.
- Ensure that System Operations is staffed with two System Operators. Consult with the Manager of System Operations.
- Notify company management of the emergency procedure, Notify Key Personnel
- The PJM System Operator Subcommittee will consider the use of public appeals to conserve electricity usage and consider the use of public announcements of the emergency. Notify the UGI System Operator Subcommittee representative whenever a PJM SOS conference call is scheduled.
- Notify the Pennsylvania Public Utility Commission (PAPUC).

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Version History

Version #	Date	Action	Change	Responsible Party	Initial/Date
0	5/1/2026	Effective Date	New	Chris Lauer	