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October 13, 2026

VIA E-FILING

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

**Re: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56
Docket No. L-2025-3058767**

Dear Secretary Homsher:

Enclosed please find the Reply Comments of UGI Utilities, Inc. – Gas Division and UGI Utilities, Inc. – Electric Division in the above matter.

Thank you for the opportunity to comment on this important topic. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Candis A. Tunilo".

Candis A. Tunilo

cc Stephanie A. Wilson (stepwilson@pa.gov)
Kriss E. Brown (kribrown@pa.gov)
Karen Thorne (kathorne@pa.gov)
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking to Further Amend the Provisions	:	
Of 52 Pa. Code Chapter 56	:	Docket No. L-2025-3058767

REPLY COMMENTS OF UGI UTILITIES, INC.

AND NOW comes UGI Utilities, Inc. (“UGI” or the “Company”) submitting these Reply Comments to stakeholders’ Comments submitted to the Notice of Proposed Rulemaking Order (“NOPR Order”) entered February 19, 2026, at the above docket.

I. INTRODUCTION

On February 19, 2026, the Public Utility Commission (“Commission”) entered the NOPR Order at the above docket proposing “to amend our regulations at 52 Pa. Code Chapter 56 to incorporate provisions of the former Chapter 14 of the Code,” which expired on December 31, 2024.¹ The Commission sought comments from interested parties, with comments ultimately due by August 28, 2026.² Comments were submitted by various stakeholders regarding the proposal in the NOPR Order, and many stakeholders provided additional proposed changes to the Commission’s Chapter 56 regulations.

UGI is comprised of an Electric Division (“UGI Electric”) and a Gas Division (“UGI Gas”). UGI Electric serves approximately 63,000 customers in all or portions of Luzerne and Wyoming Counties. UGI Gas serves approximately 700,000 customers in 46 counties throughout Pennsylvania.

¹ See NOPR Order at 1, referencing the former 66 Pa. C.S. §§ 1401-1419.

² See *Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56*, Docket No. L-2025-3058767 (Secretarial Letter dated June 18, 2026) at 1.

UGI appreciates the opportunity to provide these Reply Comments and participate in this proceeding. The Company supports the comprehensive Reply Comments submitted by the Energy Association of Pennsylvania (“EAP”). In these Reply Comments, UGI will provide additional information regarding some of the proposals recommended by other stakeholders in their comments. As stated in UGI’s letter comments submitted on August 28, 2026, the Company supports the Commission’s goal of reenacting the protections in the former Chapter 14 of the Public Utility Code into its regulations at Chapter 56 through its authority set forth in 66 Pa. C.S. Sections 501, 204, 1301, 1305 and 1501 through 1504. As such, the extent to which UGI does not respond to a specific proposed change of any stakeholder should not be construed as UGI supporting or not objecting to the proposal.

II. REPLY COMMENTS

The Commission was clear in the NOPR Order that “the instant rulemaking is not intended as a general review of Chapter 56” but is rather “intended to expeditiously amend the Chapter 56 regulations ... and provide prompt regulatory certainty in light of the expiration of Chapter 14 of the Code.”³ As such, stakeholders’ recommendations to expand Chapter 56’s reach, expand termination moratoriums, expand Chapter 56 protections to small business customers, and expand various definitions and timing requirements are well beyond the scope of this proceeding.

In fact, many of the recommendations would totally frustrate termination processes and allow certain customers to avoid termination for nonpayment indefinitely. For instance, a customer eligible for winter moratorium protection⁴ could begin amassing arrears in October, and before the utility is able to effectuate termination of service, the winter moratorium begins on December 1

³ See NOPR Order at 12.

⁴ See 52 Pa. Code § 56.100(b). The winter moratorium extends from December 1 through March 31 and applies to customers at or below 250% Federal Poverty Income Guidelines (“FPIG”). *Id.*

and protects the customer from termination until March 31 of the next year. The customer does not have to make any payment during the winter moratorium to avoid termination for nonpayment. In April, the utility sends this customer a termination notice, and at this point, the customer has accumulated nearly seven months of arrears (October through April). This customer then provides a medical certificate to avoid termination for another 90 days, the timeframe recommended by some stakeholders in this proceeding.⁵ Or if not eligible to use a medical certificate, the customer could file an informal complaint with the Commission's Bureau of Consumer Services ("BCS") disputing the amount due.⁶ If BCS denies and dismisses the informal complaint, the customer can file a formal complaint, which takes months (or years) to reach conclusion.

Regardless, in this scenario it is at least May by this point. Several stakeholders support a summer moratorium, which would then protect this customer from termination until September.⁷ This customer has now avoided payment for utility service for an entire year and is unlikely to be able to pay the amount necessary to avoid termination for nonpayment (assuming the utility has the available field personnel to effectuate termination before December 1st when the winter moratorium begins again).

UGI submits that while each of these steps is a legitimate option on its own for vulnerable customers to stay in service, some customers string them together to postpone termination indefinitely while arrears continue to grow to a point that no reasonable payment arrangement could feasibly alleviate. This example highlights that utilities need more tools available to

⁵ See Section II.C., *infra*.

⁶ In March 2026, 438 UGI customers filed informal complaints; in April 2026, 538 customers filed informal complaints; in May 2026, 347 customers filed informal complaints; in June 2026, 567 customers filed informal complaints; and in July 2026, 501 customers filed informal complaints. As described in Section II.B., *infra*, UGI effectuates terminations for arrears accumulated during the winter moratorium over several months, beginning in April for customers with the highest arrears and carrying through November.

⁷ See Section II.B., *infra*.

terminate service for those customers that abuse the system, not fewer as would be the effect of many of the stakeholders' recommendations in this rulemaking.

The ability to terminate service for nonpayment does not just protect utilities; it protects good paying customers from having to shoulder increased rates through increased uncollectibles expense. Further, stakeholders fail to address the implementation costs of their recommendations. For these reasons, UGI supports the Commission's proposal to incorporate the former Chapter 14's provisions into the Commission's regulations at Chapter 56 without modification.

A. Income Threshold

In their Joint Comments, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") and the Tenant Union Representative Network ("TURN") (collectively, "Low-Income Advocates") recommend increasing the income threshold for all protections to 300% FPIG, which would extend income-based Chapter 56 protections to both low income and moderate income households.⁸ In support of the recommendation, the Low-Income Advocates rely on asset limited, income constrained and employed ("ALICE") household data, which provides that the minimum cost to live and work in today's economy for a family of four is \$82,740, which falls *between* 250%-300% of FPIG.⁹ The Low-Income Advocates did not, however, provide any analysis on the impacts this recommendation could have on increased arrears.¹⁰

⁸ See Low-Income Advocates Joint Comments at 30-31 (relating to the definition of "change in income"), 32 (relating to the definition of "significant change in circumstances"), 34-35 (relating to late payment charges), 38 (relating to public utility screening and referrals to universal service programs), 46-48, 54-55 (relating to payment arrangements), 57 (relating to reconnection fees), 72-77 (relating to termination moratoria), 84-85 (relating generally to all Chapter 56 protections).

⁹ See *e.g.* Low-Income Advocates Joint Comments at 84. UGI notes that 300% of FPIG is \$99,000 for a family of four, which is more than \$16,000 above the quoted ALICE survival budget of \$82,740.

¹⁰ Per the Settlement of its 2026 base rate case, UGI Gas will implement an Expanded Arrearage Forgiveness pilot program for customers at 151% to 300% FPIG. See *Pa. PUC v. UGI Utilities, Inc. – Gas Division*, Docket Nos. R-

UGI strongly opposes this recommendation. ALICE research is conducted by United Way,¹¹ and the Commission has not identified or utilized ALICE as the appropriate tool on which to base eligibility for universal service programs for UGI. Even if the Commission relied on ALICE tools, the recommendation seeks to extend Chapter 56 protections to households that, by Low-Income Advocates' own admission, can afford to live in today's economy, even if it is at a minimum level. As such, these customers can afford to pay their utility bills.

Further, UGI submits that no matter what the income threshold is, there will always be customers on the outer edge of it that will be required to pay for programs for which they are not eligible. It is indeed a delicate balance. The current threshold protects low-income customers, as they are the most vulnerable to termination for nonpayment. Expanding the protections to moderate income households does not further the objective of the former Chapter 14 to eliminate opportunities for customers capable of paying utility bills to avoid payment. As such, the Low-Income Advocates' recommendation to increase the income threshold to 300% for Chapter 56 protections should be rejected.

B. Summer Moratorium

Vice Chair Kimberly Barrow indicated that she “would have appreciated seeking comments on” other topics in the NOPR Order, including establishing a summer termination prohibition procedure based on heat advisories.¹² Many stakeholders recommended the

2025-3059523 *et al.* (Joint Petition for Approval of Settlement of All Issues filed July 6, 2026) at ¶ 47 (Final Order entered Oct. 1, 2026). The pilot program will provide eligible customers with an opportunity for forgiveness of 50% of their arrearages over 24 months. UGI Gas will provide an analysis of the pilot program in its next base rate case. UGI submits that this method of program expansion tests the results in a controlled way by limiting the timeframe and number of participants before any type of permanent program is established.

¹¹ See *e.g.* Low-Income Advocates Joint Comments at 84, FN 189.

¹² See *Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56*, Docket No. L-2025-3058767 (VC Barrow Statement dated Feb. 19, 2026) at 1.

implementation of a summer moratorium on terminations to complement the already existing winter moratorium.¹³

UGI opposes adding a summer or temperature-based moratorium on terminations for nonpayment to the Commission's regulations. Moratoria on terminations allow customers to retain service while their arrears continue to accumulate. When the threat of termination is removed, many customers are not focused on paying utility bills and therefore, quite often, they do not pay anything. The arrears that accumulate for nonpaying low-income customers during a winter moratorium often reach a point where it becomes insurmountable to pay off the past due amounts, even with a payment arrangement. For example, referencing the 2023-2024 winter moratorium period, UGI's active debt for both UGI Gas and UGI Electric for customers who had arrears older than 90 days totaled \$49,189,807 on November 30, 2023, and that debt grew to \$70,088,762 by the end of the winter moratorium on March 31, 2024. As such, during the winter moratorium, these arrears grew by nearly \$21 million (42.5 percent). UGI submits this growth in arrears during the winter moratorium is typical.¹⁴ Further, as termination procedures are reinstated, the level of arrears typically declines until November 30th.¹⁵

¹³ See e.g. Low-Income Advocates Comments at 72-77 (recommending a summer termination moratorium from June 15 through August 31 for customers with incomes up to 300% FPIG); Commission on Economic Opportunity ("CEO") Comments at 2 (recommending a summer termination moratorium for the "hotter months of the year"); Consumer Advisory Council ("CAC") Comments at 4-5 (recommending the Commission explore a summer termination moratorium); Energy Justice Lab ("EJL") Comments at 3 (recommending a summer termination moratorium from May 15 through September 15 as well as termination moratoria based on temperature for other months and removing the income thresholds for termination moratoria protections); Gov. Josh Shapiro Comments at 7 (recommending a summer termination moratorium from June 15 through September 1); Joint Commenters for Utility Access ("JCUA") Comments at 3 (recommending a calendar-based summer termination moratorium); Joint Comments of Pennsylvania Ratepayers at 1 (recommending a summer termination moratorium for the hottest months); and Pennsylvania Coalition Against Domestic Violence ("PCADV") Comments at 12-13 (recommending a summer termination moratorium during periods of extreme heat).

¹⁴ When the moratorium was recently extended by a month due to a federal government shutdown, arrears for those protected from termination increased by \$28,873,866 (71.5 percent) during the winter moratorium.

¹⁵ As stated above, accumulated arrears were \$70,088,762 on March 31, 2024 (the end of a winter moratorium). By the time of the next winter moratorium, the arrears had been reduced to \$40,385,445 (as of November 30, 2024) because customers could be terminated for nonpayment.

After the winter moratorium ends, UGI begins sending termination notices to customers with arrears that had been protected from termination. Due to the volume of customers eligible for termination and UGI's available manpower, UGI cannot send all the requisite termination notices during each April. Rather, UGI begins with the customers with the highest arrears and sends termination notices to them first. Each year, it takes several months for UGI to catch up on terminations after the end of the winter moratorium. For example, the Company averaged approximately 4,115 terminations per month¹⁶ for nonpayment from April to November 2024 and 3,957 terminations for nonpayment per month from April to November 2025 and 4,435 terminations for nonpayment per month from April to September 2026.

While some may point to a lack of recruitment of eligible customers to customer assistance programs as contributing to accumulating arrears, UGI submits this argument fails to take into account the extensive outreach utilities do in this space. To be clear UGI screens all customers calling about payment arrangements to determine eligibility for CAP. Further, in recent base rate case settlements, UGI has agreed to ask all new or moving customers if they would like to provide household and income information to determine if they are eligible for universal service programs and if eligible, will be offered an opportunity to enroll in CAP.¹⁷ UGI Electric auto enrolls non-shopping customers that have received LIHEAP in the current period and elected to share their

¹⁶ By way of specific examples, UGI completed 4,920 terminations for non-payment in April 2024, 3,775 in June 2024 and 2,736 in October 2024. Overall, UGI completed 32,923 terminations for non-payment between April and November 2024. Note that these termination totals include terminations for nonpayment not related to the winter moratorium, as UGI continues to handle current terminations along with those stemming from nonpayment during the winter moratorium.

¹⁷ See *Pa. PUC v. UGI Utilities, Inc. – Gas Division*, Docket Nos. R-2025-3059523 *et al.* (Joint Petition for Approval of Settlement of All Issues filed July 6, 2026), at ¶ 51 (Final Order entered Oct. 1, 2026); *see also Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket Nos. R-2025-3059430 *et al.* (Joint Petition for Approval of Non-Unanimous Settlement of All Issues filed Sept. 10, 2026), at ¶ 39 (pending R.D.).

income data with UGI on their LIHEAP application into CAP.¹⁸ In addition UGI advertises the availability of assistance programs via bill inserts (provided every other month), telephone on-hold message, UGI's website, news releases (shortly before LIHEAP opens), the new customer guide and quarterly social media posts.¹⁹ There are a number of reasons, however, why customers eligible for winter moratorium protections do not enter CAP. For instance, some customers do not want to enter CAP, some are not eligible for CAP for reasons not related to income,²⁰ and others fail to complete the entry process. Regardless, this proceeding is not intended to be a referendum on CAP enrollment or universal service programs generally.²¹

Adding a summer moratorium, whether it is temperature-based or for a specified period, would exacerbate the accumulation of arrears for customers protected from termination. An additional moratorium would reduce the amount of time the Company would have available to issue termination notices and complete terminations, when UGI is already averaging about 4,000 terminations per month for non-payment from April 1 to November 30 each year. Additional manpower would be required to keep up, which would increase labor costs as well as increase costs for vehicles for the additional labor, vehicle maintenance, and similar expenses, which are recovered in rates.²² Further, an additional moratorium would increase uncollectibles expense for

¹⁸ See *UGI Utilities, Inc. Universal Service and Energy Conservation Plan for 2026-2030*, Docket Nos. M-2025-3054362, M-2025-3054366, P-2025-3054381 (Revised Plan filed July 2, 2026), at pp. 15-16. Auto-enrolled customers are notified by letter and provided time to decline enrollment into CAP before their enrollment is completed. *Id.* at 15.

¹⁹ *Id.* at App. I, Table 1.

²⁰ See e.g. *id.* at 17.

²¹ Further, the Low-Income Advocates correlate increases in commodity prices – which are passed through to customers without any markup by utilities – to increases in terminations for nonpayment in the last few years. See Low-Income Advocates Joint Comments at 18. While UGI supports efforts to address affordability of utility services, utilities have little to no control over commodity prices.

²² UGI notes that if the termination period were condensed from the current April through November to the recommended April to May and September to November, these additional utility personnel would be without work for the winter and summer moratoria. Temporary crews for terminations are not an available resource due to the specialized training these crews require. Therefore, adding a summer moratorium would create an ever-increasing termination backlog or idle utility crews, or possibly both.

UGI's customers. Yet, it would do nothing to encourage payment of utility bills by those who can do so, which is the intent of the former Chapter 14.²³

UGI submits that summer or temperature-based termination protections for customers should be left to the utilities' discretion. UGI Electric has already implemented a policy to pause all terminations on days when temperatures are forecasted to reach 90 degrees or higher. Even if temperatures over 90 degrees are expected for several days, UGI Electric issues termination notices for nonpayment during such periods. A moratorium would prohibit actual termination of service but also prohibit the issuance of termination notices for nonpayment for certain income-eligible customers even though a termination notice is valid for 60 days from issuance,²⁴ and termination of service could be effectuated during a period of lower temperatures within that timeframe.

For all the foregoing reasons, UGI opposes the implementation of additional moratoria on terminations for nonpayment. Instead, UGI submits that utilities should be permitted to utilize discretion in pausing terminations during periods of higher temperatures.

C. Medical Certificates

In her Statement, Vice Chair Barrow indicated that she would appreciate comments on expanding the group of people who can sign a medical certificate.²⁵ Several stakeholders recommend expanding the pool of individuals who may sign a medical certificate.²⁶ Some stakeholders went even further by recommending expanded protections, such as increasing the

²³ See NOPR Order at 1.

²⁴ See 52 Pa. Code § 56.91(a).

²⁵ See *Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56*, Docket No. L-2025-3058767 (VC Barrow Statement dated Feb. 19, 2026) at 1.

²⁶ See e.g. Low-Income Advocates Joint Comments at 63-72; CAC Comments at 6-7; OCA Comments at 107.

timeframe to obtain and submit a medical certificate from three (3) days to (7) days, extending the length of medical certificate protections beyond 30 days, and creating an even longer certification period for those with chronic illnesses.²⁷

UGI submits that the recommendation of the Low-Income Advocates and OCA to add registered nurses (“RNs”) to the list of individuals that sign a medical certificate²⁸ presumes that RNs are permitted to assess whether a person’s medical condition renders him “seriously ill” or that it would be “aggravated by cessation of [utility] service.” While there is no doubt that RNs are competent medical professionals based on education and training requirements to obtain an RN license, there is doubt whether their licensing permits analyzation of a patient’s chart for purposes of identifying the level of illness or the requirements for managing the illness, which is what would be required to execute a medical certificate. Even if the recommendation to allow RNs to execute medical certificates is adopted, it does not automatically mean that RNs will do so, especially if they do not feel comfortable that their license permits them to make the assessments required to execute a medical certificate.

Additionally, UGI opposes OCA’s recommendation to add “home healthcare provider” to the list of individuals that may sign a medical certificate.²⁹ OCA does not provide a proposed definition of “home healthcare provider,” but it appears the category would include certified nurse assistants as well as family members or other non-healthcare professionals that are the primary caretakers of a person with a medical condition that is homebound or elderly. UGI submits that expanding who can execute a medical certificate in this manner would make the program an easy

²⁷ See Low Income Advocates Joint Comments at 63-72; CAC Comments at 6-7.

²⁸ See Low Income Advocates Joint Comments at 65, 67-69; OCA Comments at 107.

²⁹ See OCA Comments at 73-74, 107.

target for misuse, as the declarations required for a valid medical certificate would be made by individuals without any training whatsoever in making medical diagnoses or treatment plans.

Next, UGI submits that recommendations to extend the timeframe in which medical certificates would pause termination for nonpayment should be rejected. As the Low-Income Advocates confirm, Chapter 56 “provides *short-term* protection from involuntary termination for medically vulnerable households.”³⁰ Currently, the short-term protection is for 30 days. That is 30 days for the household to bring the account current, which is enough of a reprieve from termination to ease the immediate crisis but not too much time to allow the household to move the issue to the back burner. UGI submits that tripling the duration of a medical certificate to 90 days (or more for a chronic illness or condition) would allow households to put payment of the utility bill out of mind because there is no threat of termination for nonpayment for months.³¹ As already discussed in these Reply Comments, *supra*, without the threat of termination for nonpayment, many households continue to accumulate additional arrearages. These unpaid arrearages will likely have to be paid by other customers in rates, which exacerbates the affordability of utility service.

Finally, UGI submits that it already provides customers with additional time (an additional seven (7) days) to provide a medical certificate if UGI is contacted by a doctor’s office within three (3) days to indicate that one is forthcoming.

For the foregoing reasons, UGI opposes recommendations to expand the pool of who can execute a medical certificate or expanding the duration of medical certificates.

³⁰ See Low-Income Advocates Comments at 64. (Emphasis added).

³¹ In 2025, approximately 3,400 medical certificates were used by UGI customers to delay termination for nonpayment. Approximately 400 of the customers utilizing medical certificates were already in UGI’s CAP, another approximately 400 were enrolled in CAP in the same year they utilized a medical certificate to delay termination, and the remainder were not in CAP in the year they utilized a medical certificate to delay termination. UGI experienced similar levels for these categories in 2024.

D. Victims of Domestic Violence

PCADV recommends that the Commission expand the methods by which victims of domestic violence can access utility protections.³² More specifically, PCADV recommends that in addition to a court order for protection as proof of domestic violence victim status, utilities should also accept third-party verification by an appropriate third-party professional with knowledge of the victim’s circumstances as well as victim self-verification.³³

UGI notes that the NOPR Order does not address this topic, and therefore, these recommendations are outside the scope of this proceeding. That said, UGI worked directly with domestic violence victim advocates in developing its current processes available to victims of domestic violence. Further, UGI has agreed to “update protections for victims of domestic violence to also accept a written certification from a domestic violence counselor/advocate” in its Gas Division and pending Electric Division base rate case settlements.³⁴

The Company, however, does not support expanding the Chapter 56 regulations to allow self-certification. Specifically with regard to self-certification, there is no guidance in Chapter 56 for customers to determine if they actually fall into the protected category, and individual perspectives may vary significantly on what constitutes domestic violence. As such, allowing self-certification could significantly increase the number of customers seeking protection and require the hiring or re-assignment of additional utility personnel. Currently, UGI has two employees that are specially trained and dedicated to confidentially assisting victims of domestic violence.

³² See *gen’ly* PCADV Comments.

³³ *Id.* at 4.

³⁴ See *Pa. PUC v. UGI Utilities, Inc. – Gas Division*, Docket Nos. R-2025-3059523 *et al.* (Joint Petition for Approval of Settlement of All Issues filed July 6, 2026), at ¶ 49 (Final Order entered Oct. 1, 2026); *see also Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket Nos. R-2025-3059430 *et al.* (Joint Petition for Approval of Non-Unanimous Settlement of All Issues filed Sept. 10, 2026), at ¶ 37 (pending R.D.).

For the foregoing reasons, UGI opposes recommendations to expand who can attest to a customer being a victim of domestic violence to include self-certification.

E. Small Businesses

The Office of Small Business Advocate (“OSBA”) recommends expanding Chapter 56 protections to small business customers.³⁵ UGI submits that UGI – Gas Division currently offers small business customers six-month payment plans for past due balances that contact the Company. UGI – Electric Division agreed to permit small business rate classes to participate in the payment program in the pending settlement of its 2026 base rate case.³⁶

OSBA provided no analysis on which small businesses would qualify or what provisions of Chapter 56 should apply to small businesses. There is no low-income threshold established for small businesses. To expand additional protections of Chapter 56 to small businesses, UGI would be required to make various process changes. Yet, without knowing who would qualify for which provisions in Chapter 56, UGI is unable to determine which exact process changes would be required. Regardless, IT changes as well as training for current personnel would be necessary to implement any changes. UGI estimates the costs associated with making such changes to be \$650,000.

³⁵ See *gen’ly* OSBA Comments.

³⁶ See *Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket Nos. R-2025-3059430 *et al.* (Joint Petition for Approval of Non-Unanimous Settlement of All Issues filed Sept. 10, 2026), at ¶ 35 (pending R.D.).

F. Late Charges and Reconnection Fees

Several stakeholders recommend expanding the waiver of late charges and reconnection fees for all low-income customers.³⁷ UGI submits that it currently waives late fees for its CAP customers and those on Level 1 (up to 150% FPIG, self-reported) payment arrangements.

That said, both UGI Gas and UGI Electric must roll a truck to effectuate all terminations, and therefore, charging reconnection fees are appropriate. Further, late payment revenue is credited to UGI's approved revenue requirements, and as such, this revenue lowers rates for all customers. Stakeholders that recommend waiving these fees for all households up to 300% FPIG have not provided any analysis on how doing so would affect costs to other customers. For these reasons, UGI does not support recommendations related to waivers for these appropriate fees.

III. CONCLUSION

UGI Utilities, Inc. appreciates the opportunity to participate in this proceeding and supports the comprehensive Comments and Reply Comments submitted by EAP. The Company also provides these Reply Comments for consideration.

Respectfully submitted,



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Counsel for UGI Utilities, Inc.

Date: October 13, 2026

³⁷ See e.g. Low-Income Advocates Comments at 34-35 (waiver of fees for incomes up to 300% FPIG); OCA Comments at 4, 77-78; CAC Comments at 5-6.