



1                   **PREPARED DIRECT TESTIMONY OF MITCHELL MILLER**

2   **Q:     Please state your name, occupation and business address.**

3   A:     Mitchell Miller. I currently provide consulting services regarding utility programs that  
4   promote the public interest with a focus on low income households. My address is 60 Geisel  
5   Road, Harrisburg, PA 17112.

6   **Q:     Briefly outline your education and professional background.**

7   A:     As my attached resume shows, I received my B.S. Degree in Community Development  
8   from Pennsylvania State University, where I graduated *cum laude* in 1974, and a M.A degree in  
9   Public Administration from Shippensburg University in 1984. I have over 35 years of  
10  experience in the development, implementation, and evaluation of program design for residential  
11  utility consumers. The focus of my work has concerned education, energy efficiency, credit and  
12  collections, and customer assistance programs.

13         After serving as a research analyst at both the Pennsylvania Governor’s Action Center  
14  and the Pennsylvania Public Utility Commission (“Commission”), I was appointed Chief of the  
15  Commission’s Division of Research and Planning in 1978 and, in 1992, I was designated as the  
16  Director of the Bureau of Consumer Services, where I served until my retirement from the  
17  Commission in 2009.

18         Following my retirement from the Commission in 2009, I served for over three years as a  
19  consultant to the Pennsylvania Department of Community and Economic Development  
20  (“DCED”) on weatherization and energy efficiency for the Pennsylvania Weatherization  
21  Assistance Program (WAP). My resume is attached as Appendix A.

1 **Q: Please describe the focus of your work over the past thirty-five years.**

2 A: During my tenure at the Commission, I was primarily engaged in activities relating to  
3 regulatory policy involving residential customer service, complaint handling, credit and  
4 collections, and universal service, including customer assistance programs and low-income  
5 energy efficiency and conservation. The Bureau of Consumer Services has regulatory authority  
6 and responsibility for policy development for all areas of consumer services including resolving  
7 consumer complaints and problems, enforcing consumer regulations, developing, implementing  
8 and evaluating programs involving complaint handling, complaint analysis, collections,  
9 enforcement of consumer regulations, utility customer assistance programs and low income  
10 conservation. My focus at DCED was the creation of a performance-based Weatherization  
11 Assistance Program system, dedicated to a high standard of quality, compliance and production.

12 **Q: What is your relevant experience on issues of low-income utility affordability?**

13 A: During my tenure, the Commission emerged as a national leader in research,  
14 development, and oversight of programs addressing credit and collection issues affecting low-  
15 income utility consumers. I was responsible for evaluating utility and Commission customer  
16 service programs, identifying problems and making recommendations for change. These  
17 activities led to the recognition of the need for development of integrated programs for low  
18 income consumers. As director of BCS, I was responsible for the development, oversight, and  
19 monitoring of the initial pilot and then the statutorily required low-income Universal Service  
20 Programs. Each of these programs is structured to provide a different form of assistance to low-  
21 income customers to enable those customers to afford and maintain basic service. For example,  
22 the Customer Assistance Program (CAP) provides alternatives to traditional collection methods  
23 for low income, payment troubled utility customers, and the Low Income Usage Reduction

1 Program (“LIURP”) is a targeted weatherization program designed to assist low-income  
2 households with the highest energy consumption, payment problems, and arrearages. These  
3 programs work in tandem and are designed to assist low-income households have affordable  
4 utility services and safe living environments while reducing utility collection and therefore  
5 benefitting other ratepayers.

6 As director of BCS, I supervised the review and determination of thousands of low-income  
7 consumer complaints and inquiries as well as the reviews of utility performance at handling these  
8 customer complaints and payment arrangement requests.

9 I directed the creation, development, and evaluation of the expansion and the  
10 effectiveness of the Universal Service Programs in Pennsylvania that are targeted toward low-  
11 income households. These programs included CAP and LIURP, as well as the Customer  
12 Assistance Referral Evaluation program (CARES) and utility-funded hardship funds. In  
13 addition, the passage of the Electricity Generation and the Natural Gas Customer Choice and  
14 Competition Acts required that the Commission ensure that universal service and energy  
15 conservation services are appropriately funded and available in each utility distribution territory.  
16 The Bureau of Consumer Services was responsible for Commission oversight of these programs  
17 since their inception.

18 Further, upon my retirement from the Commission, I served as a consultant on  
19 weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program  
20 (WAP) at DCED. I was instrumental in transforming the WAP program by creating a  
21 performance-based system, dedicated to a high standard of quality, compliance and production.  
22 Innovations included introducing performance standards for production, quality and compliance  
23 and independent state certification and training for all state WAP workers. I was also responsible

1 for coordinating DCED’s WAP program with the Commission’s LIURP and Act 129 low-income  
2 programs. Currently, I am also under contract as a policy consultant for the Philadelphia Water  
3 Department. The contract is to provide consulting services that will lead to the improvement to  
4 the informal dispute and hearing process, and the development of deferred payment agreements.

5 I have participated at the National Association of Regulatory Utility Commissioners  
6 (“NARUC”), the National Low Income Energy Consortium and the National Energy Utility  
7 Affordability Conference meetings and have presented numerous sessions related to low-income  
8 utility affordability. I current serve on the board of directors of the Keystone Energy Efficiency  
9 Alliance (“KEEA”) and as a co-chair of the KEEA annual conferences. I am also a member of the  
10 WAP Policy Advisory Council.

11 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

12 A: Yes. I have submitted testimony in a number of proceedings before the PUC. Below is a  
13 list of the proceedings in which I presented testimony, in reverse chronological order.

- 14 • Petition of Duquesne Light for Approval its Act 129 Phase III Energy Efficiency and  
15 Conservation Plan, Docket No. M-2015-2515375
- 16 • Petition of PECO Energy Co. for Approval its Act 129 Phase III Energy Efficiency and  
17 Conservation Plan, Docket No. M-2015-2515619
- 18 • Consolidated Petition of First Energy Companies for Approval its Act 129 Phase III  
19 Energy Efficiency and Conservation Plan, Docket Nos. M-2015-2514767, -2514768, -  
20 2514769, 2514772
- 21 • Petition of Philadelphia Gas Works for Approval of its Phase II Demand Side  
22 Management Plan, Docket No. P-2014-2459362
- 23 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2015-2468056
- 24 • Pa. PUC v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275
- 25 • Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2014-2406274
- 26 • Verizon Pa., LLC, and Verizon North, LLC, Petition for Competitive Classification,  
27 Docket Nos. P-2014-2446303, P-2014-2446304
- 28 • Petition of PECO Energy Co. for Approval its Act 129 Phase II Energy Efficiency and  
29 Conservation Plan, Docket No. M-2012-2333992

- 1       • Petition of PECO Energy Co. for Approval of its Default Service Program II, Docket No.  
2       P-2012-2283641  
3       • Petition of PECO Energy Co. for Approval of its Universal Service and Energy  
4       Conservation Plan, Docket No. M-2012-2290911.  
5

6       **Q:    Have you provided litigation support for the Commission?**

7       A:     I did not testify in any proceeding during my tenure at the Commission. However, I directed  
8       the Bureau’s activities in policy development, as well as enforcement litigation to ensure  
9       compliance with customer service regulations and statutes.

10      **Q:    For whom are you testifying in this proceeding?**

11      A:     I am testifying on behalf of the Coalition for Affordable Utility Services and Energy  
12      Efficiency in Pennsylvania (“CAUSE-PA”).

13      **Q:    What is the purpose of your testimony?**

14      A:     CAUSE-PA intervened in this proceeding to ensure that UGI Utilities Inc., Gas Division’s  
15      (UGI or the Company) proposed rate increase – as well as the policies, procedures and practices  
16      for the provision of service – will not adversely affect UGI’s low-income customers’ ability to  
17      connect to, maintain, and afford natural gas service, which is essential for home heating, water  
18      heating, and cooking.

19            In my testimony, I will explain the effect that UGI’s proposed 19.7% increase in the  
20      Residential Customer Charge will have on the ability for a low-income household to afford natural  
21      gas service. I will also discuss UGI’s proposal to recover an increased portion of the residential  
22      cost of service through a fixed charge, as opposed to the volumetric charge. As I will explain,  
23      recovery of customer costs through a fixed charge is unduly discriminatory and uniquely harmful  
24      to low income households.

**CAUSE-PA Statement 1, Mitchell Miller**  
**PUBLIC VERSION**

1           In addition to addressing the overall impact of a rate increase and the rate design on low  
2 income families, I will discuss several troubling aspects of UGI’s service delivery which further  
3 complicate the ability of low income customers to connect with and maintain natural gas service.  
4 I will offer recommendations for improving policies and procedures and to mitigate the further  
5 harm to low-income customers that is certain to result from UGI’s proposed rate increase and  
6 design which, as presently proposed, would stunt the ability of this vulnerable customer population  
7 to access service.

8           My testimony is in addition and complimentary to the testimony of CAUSE-PA’s other  
9 two witnesses: Ms. Marielle Macher, Esquire, who addresses UGI’s language access policies and  
10 its service to customers with limited English proficiency (CAUSE-PA ST 2); and Ms. Judith  
11 Lewis, Esquire, who addresses UGI’s policies and practices for serving customers who are victims  
12 of domestic violence (CAUSE-PA Statement 3). Taken together, these three pieces of testimony  
13 address aspects of UGI’s deficiencies regarding its services for economically and otherwise  
14 vulnerable customers.

15 **Q:     What changes does UGI propose for its residential rate class?**

16 A:     In relevant part, UGI proposes to increase its overall residential rate approximately 19%.  
17 Specifically, this translates to an average customer bill increase of \$10.20 per month from \$51.77  
18 to \$61.97.<sup>1</sup> Looking only at the distribution service, UGI’s proposed increase in residential  
19 distribution rates is almost 40%. UGI proposes to actualize this increase by more than doubling  
20 its fixed customer charger from \$8.55 to \$17.50 per month, and by changing its current declining  
21 block structure for volumetric rates to a single block volumetric charge of \$3.0123 per Mcf.<sup>2</sup>

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<sup>1</sup> UGI Notice of Proposed Rate Change.

<sup>2</sup> UGI Stmt. 6, Lahoff, at 22-23.

1           In my view, the increase as a whole, and specifically UGI’s decision to shift a significant  
2 part of the increase to a fixed customer charge, will have a devastating effect on the ability of  
3 UGI’s low-income customers to maintain service, and will be particularly difficult for the vast  
4 majority of low-income customers: those who are not enrolled in UGI’s Customer Assistance  
5 Program (CAP).

6 **Q:     Why are you focusing more closely on low income households not enrolled in CAP?**

7 A:     I am distinguishing between CAP and non-CAP low income customers – and focusing  
8 more closely on the latter – because non-CAP low income customers will suffer an immediate  
9 and significant economic harm as a result of the proposed increase. This is the case because  
10 UGI’s CAP rate is calculated based on a percentage of the customer’s income or the customer’s  
11 budget bill, whichever is lower. The rate impact will, thus, not be directly felt by CAP-enrolled  
12 customers, to the extent they remain in the program.<sup>3</sup>

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<sup>3</sup> See Revised Universal Service and Energy Conservation Plan for the Four Year Period January 1, 2014 through December 31, 2017, Docket No. M-2013-2371824, at 11 (Amended Pursuant to the Final Order Entered January 15, 2015) (hereinafter UGI 2014-2017 USECP).

1 **Q: How many non-CAP, low-income customers live within UGI's service territory?**

2 A: UGI has 84,809 estimated low income households, and 35,100 confirmed low-income  
3 customers, yet only 7,966 are enrolled in CAP.<sup>4</sup> In other words, between 77 and 91% of UGI's  
4 low income customers are not enrolled in CAP and therefore pay full tariff rates.

5 **Q: Why aren't all low income customers enrolled in CAP?**

6 A: There are a lot of reasons why a customer may not be enrolled in CAP. As a simple  
7 matter, many low income consumers are not aware of or informed about the benefits available  
8 through CAP or are not referred to CAP in a manner which allows the customer to understand  
9 the terms and enroll in the program. Other low income customers are aware of the program and  
10 the benefits – but are subject to a year-long stay-out for having voluntarily withdrawn from the  
11 program.<sup>5</sup> Still others may know about and be interested in the program, but may face barriers

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<sup>4</sup> As of March 2, 2016, UGI had a total CAP enrollment of 7,966, compared to 84,809 estimated and 35,100 confirmed UGI customer households with income at or below 150% of the Federal Poverty Guidelines. Appendix B (Responses of UGI to CAUSE-PA I-4, I-5, and I-6 and respective attachments I-4-1, I-5-1, and I-6-1).

<sup>5</sup> UGI USECP at 13-14. The policy, and resulting impact of this 12-month stay-out provision was highlighted in a recent article published in the Patriot News. The article follows the path of one UGI customer through periods of extreme economic hardship, explaining the cause of the household leaving CAP and the effect of the stay-out provision in exacerbating the customer's hardship:

But in April of last year, Douglass made a mistake that would eclipse any of his previous indiscretions with UGI.

That month, according to Douglass, his monthly usage had fallen to only \$40 – significantly less than the fixed \$127 he was supposed to pay as part of UGI's customer assistance program. Douglass said that he believed this meant he was supposed to call UGI and ask to be removed from the program until his monthly bills exceeded \$127 again.

But the next month, Douglass discovered that by exiting the program he had inadvertently broken his plan to pay the debt he owed to the company – Douglass said the company wanted the entirety of the \$2,351 that he owed it.

Daniel Simmons-Ritchie, *How a Controversial Law Left a Harrisburg Family in the Cold*, The Patriot News / PennLive (Feb. 25, 2016), available at [http://www.pennlive.com/news/2016/02/how\\_a\\_controversial\\_law\\_left\\_a.html](http://www.pennlive.com/news/2016/02/how_a_controversial_law_left_a.html).

1 such as the inability to produce identification documents,<sup>6</sup> read or write, or - when an in-person  
2 application is required - to secure time off work, childcare, and transportation.<sup>7</sup>

3 While some of these issues are consistent across utility service territories, UGI's CAP  
4 enrollment is, and has historically been, much lower than the average CAP enrollment of other  
5 Natural Gas Distribution Companies (NGDCs). To me, UGI's uniquely low CAP rate signals  
6 that its internal policies and procedures are to blame for UGI's CAP under-enrollment. The  
7 following table compares UGI's CAP enrollment rate with the weighted NGDC average over the  
8 last 10 years:

9 **TABLE 1: CAP Participation Rate – UGI Gas Compared to NGDC Average<sup>8</sup>**

<b>CAP Participation Rate</b>	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	21%	29%	29%	27%	24%	21%	17%	13%	11%	18%
Weighted NGDC Average	38%	44%	42%	43%	40%	41%	40%	37%	36%	37%

10  
11 Despite this, UGI is not proposing to adopt any changes to its universal service programs to  
12 offset the financial hardship that will result from its proposal to raise residential rates nearly  
13 20%.

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<sup>6</sup> See CAUSE-PA Statement 2, Marielle Macher.

<sup>7</sup> At the public input hearing on March 31, 2016, at 1:00pm, Ms. Kay Pickering – a volunteer at the Harrisburg Center for Peace & Justice – testified that many of these barriers keep her clients from accessing the program, even if they want to apply.

<sup>8</sup> Table compiled from the following BCS reports: Report on 2014 Universal Service Programs & Collections Performance, at 42; Report on 2013 Universal Service Programs & Collections Performance, at 37; Report on 2011 Universal Service Programs & Collections Performance, at 40; Report on 2009 Universal Service Programs & Collections Performance, at 39; Report on 2007 Universal Service Programs & Collections Performance, at 39, available at [http://www.puc.pa.gov/filing\\_resources/universal\\_service\\_reports.aspx](http://www.puc.pa.gov/filing_resources/universal_service_reports.aspx). Note that percentages were rounded to the nearest whole number.

1 **Q: How would UGI's proposed rate increase impact low income households not**  
2 **enrolled in CAP?**

3 A: The proposed rate increase would have a significant detrimental impact on the ability of  
4 low income households not enrolled in CAP to connect to, maintain, and afford UGI's natural gas  
5 service. Rate accessibility and affordability are critical components to utility regulation and rate  
6 design, as these concepts are part and parcel to the imposition of just and reasonable rates.

7 In determining rate affordability, it is helpful to look at average energy burdens, or the  
8 percentage income a household pays for home energy costs. A residential ratepayer with a  
9 moderate household income of \$50,000 or more pays an average of just 3% of their after-tax  
10 income on home energy costs.<sup>9</sup> In comparison, UGI's CAP targets affordability at 7% of income  
11 for households between 0-50% FPL; 8% of income for households between 51-100% FPL; and  
12 9% of income for households between 101-150% FPL.<sup>10</sup> Although the program plays a critically  
13 important role in reducing the energy burdens of the most economically vulnerable populations,  
14 UGI's required CAP payments, set at double or triple the energy burden level of a household with  
15 a net income of \$50,000, does not result in bringing low income customers into full parity with  
16 average residential energy burdens.

17 But again, between 77 and 91% of low income customers in UGI's service territory are not  
18 enrolled in CAP, and are unable to reduce their energy burdens to even that of CAP participants,

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<sup>9</sup> Diana Hernandez, *Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change*, 103(4) Am. J. Pub. Health (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20>.

<sup>10</sup> UGI 2014-2017 USECP at 15; see also 52 Pa. Code § 69.261. The CAP Policy Statement provides that – to reach affordability – gas heating should cost no more than 5-8% of income for a household at between 0 and 50% of poverty; 7-10% of income for a household between 50 and 100% of poverty; and 9-10% of income for a household between 101-150% of poverty. 52 Pa. Code § 69.265. The combined cost to a low-income customer for both gas heating and electric nonheating should not cost no more than 7-13% of income for those at 0-50% of poverty; 11-16% of income for those at 50-100% of poverty; and 15-17% for those at 101-150% of poverty. *Id.*

1 let alone middle income households. Compared to both average residential customers and low  
2 income CAP customers, low-income customers who are not enrolled in CAP have significantly  
3 higher energy burdens. The National Low Income Energy Consortium (NLIEC) conducted a  
4 survey designed to capture a nationally representative picture of the issues facing low income  
5 households.<sup>11</sup> The study found that “households with incomes below 50% of the federal poverty  
6 level pay a staggering 38% or more of their annual income for their home energy bills.”<sup>12</sup>

7         The overwhelming energy burden on low income households makes it difficult for these  
8 customers to pay for other basic necessities such as housing, food, and medicine; can threaten  
9 stable and continued employment and education; and can create serious public safety risks.<sup>13</sup> Of  
10 the households surveyed in the NLIEC study, 46% went without food and 45% failed to take  
11 medication as prescribed by doctors in order to pay their home energy bills.<sup>14</sup> An alarming 54%  
12 reported using an oven for space heating.

13 **Q: Is the threat of increased termination for low income households significant?**

14 A: Yes, very significant. Low income customers have a considerably higher rate of  
15 involuntary, payment-based termination compared to average residential customers. In 2014,  
16 UGI’s confirmed low-income customers were terminated by UGI at a rate of 19.3%, compared to

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<sup>11</sup> Nat’l Low Income Energy Consortium, *Paid but Unaffordable: The Consequences of Energy Poverty in Missouri – and Elsewhere*, at 2-5 (2004), available at [http://www.neuac.org/2004\\_MO%20Overview.pdf](http://www.neuac.org/2004_MO%20Overview.pdf).

<sup>12</sup> *Id.*; see also Diana Hernandez, *Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change*, 103(4) Am. J. Pub. Health (2013), available at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20> (explaining that households with an annual income of \$10,000 pay approximately 33% of their after-tax income on energy costs).

<sup>13</sup> Nat’l Low Income Energy Consortium, *Paid but Unaffordable: The Consequences of Energy Poverty in Missouri – and Elsewhere*, at 2-5 (2004), available at [http://www.neuac.org/2004\\_MO%20Overview.pdf](http://www.neuac.org/2004_MO%20Overview.pdf).

<sup>14</sup> *Id.*

1 3.4% for all residential customers.<sup>15</sup> This includes both CAP and non-CAP confirmed Low  
2 Income customers. Confirmed non-CAP customers are terminated at an even higher rate. In 2015,  
3 CAP customers were terminated a rate of 16%, while non-CAP confirmed low income customers  
4 were terminated at a rate of 22%.<sup>16</sup> At the same time, terminations are on the rise in UGI's service  
5 territory: confirmed low income termination rates rose 18.4% from 2012 to 2014.<sup>17</sup>

6 Evidence further suggests that low income customers are often unable to reconnect to  
7 natural gas service, and may go for extensive periods of time before restoration is possible. In  
8 2014, UGI terminated 8,018 confirmed low income customers, but less than half were reconnected  
9 – just 3,242.<sup>18</sup> In fact every year, termination numbers far surpass reconnection numbers, signaling  
10 that more and more customers are going without central heating systems, cook-tops, and other  
11 essential components of a healthy and safe home. When unable to use their primary heating  
12 system, families often resort to dangerous, high usage / high cost heating methods – such as electric  
13 space-heaters, electric stoves, and/or portable generators – which increases the risk of carbon

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<sup>15</sup> Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 12-13 (2015), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2014.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf).

<sup>16</sup> Appendix B (Responses of UGI to CAUSE-PA I-16 & I-18).

<sup>17</sup> Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 12-13 (2015), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2014.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf).

<sup>18</sup> Pa. PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 11, 14 (2014), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2013.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2013.pdf).

1 monoxide poisoning and house fires.<sup>19</sup> Loss of the ability to heat, cook, and access hot water is  
2 also a common catalyst to homelessness, especially for families with children.<sup>20</sup>

3 Table 2 below shows that, over the last decade, UGI’s low income termination rates have  
4 consistently and significantly outpaced the average NGDC termination rate, yet – with the  
5 exception of just one year - UGI’s reconnections have been, consistently and significantly lower  
6 than industry average.

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<sup>19</sup> “Space heaters accounted for 33% of 2007-2011 reported home heating fires, 81% of home heating fire civilian deaths, 70% of home heating fire civilian injuries, and 51% of home heating fire direct property damage.” Nat’l Fire Protection Ass’n, Fire Analysis & Research Division, *Home Fires Involving Heating Equipment*, at ix & 33 (Oct. 2013). While there are no state-wide statistics on space heater-related fires in Pennsylvania, we can see that the national statistics are on par with statewide statistics by looking to the local news carriers, which regularly report on space-heater related fires, injuries, and deaths.

<sup>20</sup> In a report issued April, 2016 by the Joint State Government Commission, utility assistance ranked in the top three types of assistance noted by survey respondents (24.1 percent) that would have prevented homelessness. Joint State Government Commission, *Homelessness in Pennsylvania: Causes, Impacts, and Solutions*, at 112, 157, 160 (April 2016), available at [http://jsg.legis.state.pa.us/publications.cfm?JSPU\\_PUBLN\\_ID=447](http://jsg.legis.state.pa.us/publications.cfm?JSPU_PUBLN_ID=447) (“When asked if there were any services that may have prevented them from becoming homeless, the women responded overwhelmingly that assistance with past-due rent and utilities, security deposit, and first and last months’ rent would have been most beneficial.”); see also Roger D. Colton, *Prepayment Utility Meters, Affordable Home Energy, and the Low Income Utility Consumer*, ABA J. Affordable Housing & Community Development (2001). As explained by Mr. Colton,

Home energy costs invariably affect the availability of housing as well. There is, for example, a documented relationship between utility disconnection and homelessness. Research in Philadelphia has found that “the relationship between terminations and homelessness is ... clearly discernible.” Surveys of homeless persons and emergency shelter providers across Pennsylvania “have found the loss of utility service to be a minor, but consistent contributor to homelessness. Among the dominant housing-related reasons for homelessness, utility terminations were cited as the cause 7.9% of the time.” High energy prices “also undoubtedly contribute to the other, more frequently cited reasons for homelessness, such as ‘lack of housing in income range,’ and ‘eviction for nonpayment.’”

*Id.* (internal citations omitted).

**1 TABLE 2: Confirmed Low Income Terminations & Reconnections<sup>21</sup>**

<b>Confirmed LI Termination Rate</b>	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	32%	21%	30%	30%	26%	21%	21%	16%	17%	19%
NGDC Average	12%	12%	13%	17%	14%	13%	12%	12%	12%	13%

<b>Confirmed LI Reconnection Rate</b>	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
UGI Gas	52%	18%	69%	64%	55%	57%	42%	47%	48%	47%
NGDC Average	72%	56%	58%	63%	64%	65%	62%	67%	67%	65%

2

3 In other words, UGI’s low income customers are more likely to be terminated and less likely to be

4 reconnected than low income natural gas customers who reside elsewhere in the state. The

5 average length of termination for UGI’s low income customers ranges from 45 days for CAP

6 customers to 50 days for non-CAP confirmed low income customers.<sup>22</sup> Though, as the low

7 reconnection rates above indicate, we simply do not know how many households are terminated

8 for a significantly longer period of time.<sup>23</sup>

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<sup>21</sup> Table compiled from the following BCS reports: Report on 2014 Universal Service Programs & Collections Performance, at 13,15; Report on 2011 Universal Service Programs & Collections Performance, at 12; Report on 2010 Universal Service Programs & Collections Performance, at 12; Report on 2009 Universal Service Programs & Collections Performance, at 12; Report on 2008 Universal Service Programs & Collections Performance, at 10; Report on 2007 Universal Service Programs & Collections Performance, at 10; Report on 2006 Universal Service Programs & Collections Performance, at 10; Report on 2005 Universal Service Programs & Collections Performance, at 10. These reports are all *available at* [http://www.puc.pa.gov/filing\\_resources/universal\\_service\\_reports.aspx](http://www.puc.pa.gov/filing_resources/universal_service_reports.aspx). Note that percentages were rounded to the nearest whole number.

<sup>22</sup> Appendix B (Responses of UGI to CAUSE-PA I-16, I-17, I-18, and I-19).

<sup>23</sup> At the public input hearing on March 31, 2016, at 1:00pm, Ms. Kay Pickering, a volunteer at Harrisburg Center for Peace & Justice, testified that many of the UGI customers she assists spend months without natural gas service:

1           Low income customers – particularly those not enrolled in CAP - are already subject to  
2 regular and lengthy termination. If cost of service increases without critical changes to UGI's  
3 policies and practices, UGI's vulnerable low income customers will experience a continued and  
4 escalated rise in the rate of termination.

5   **Q:     Does LIHEAP mitigate the harm of the proposed rate increase on non-CAP low**  
6 **income households?**

7   A:     No. Relative to need, there are – proportionately - very few UGI customers that receive  
8 LIHEAP assistance. As of March 1, 2016, UGI collected a total of 7,699 LIHEAP cash grants  
9 on behalf of low income customers.<sup>24</sup> Of the grants received, 2,469 were received on behalf of  
10 CAP customers, and 5,230 were received on behalf of non-CAP customers.<sup>25</sup> While LIHEAP is  
11 a critically important program and provides life-sustaining assistance to those in need, the Cash  
12 grant is intended to provide only supplemental assistance and it is not enough to mitigate the  
13 financial harm that will be felt by the approximately 75,000 low income households affected by  
14 the rate increase. Indeed, if the rate increase were approved as proposed, the average residential  
15 bill would increase by nearly the same amount as the average LIHEAP cash grant,<sup>26</sup> essentially  
16 eclipsing the entire benefit received by low income customers through the LIHEAP program.

17   **RATE DESIGN**

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Mia and her family have been without gas heat for two years. ... Lisa is disabled, uses a walker and has been without gas for about 10 months. ... Tyisha has 4 children and has not been able to get her gas turned on because she could not pay the back bills she accumulated when she lived at 3 previous residence.

Prepared Written Testimony of Kay Pickering (March 31, 2016).

<sup>24</sup> Appendix B (Response of UGI to CAUSE-PA I-7 and attachment).

<sup>25</sup> Appendix B (Response of UGI to CAUSE-PA I-8).

<sup>26</sup> See Energy Assistance Summary (EASUM) prepared by the Pennsylvania Department of Human Services for the period of 9/27/15 through 3/31/16, which shows that statewide, for the 15-16 LIHEAP year, the average cash grant for gas heating customers was \$192 and the average overall cash grant was \$147. This EASUM is attached hereto as Appendix C.

1 **Q: How would UGI’s proposed rate design impact low income households?**

2 A: UGI is proposing to recover an increased portion of its costs through the fixed residential  
3 customer charge – from its current rate of \$8.55 to a proposed rate of \$17.50.<sup>27</sup> Increased fixed  
4 charges are exceptionally harmful to low-income customers, and should not be approved.

5 Increasing the costs recovered through a fixed charge – as opposed to a volumetric charge  
6 – undermines the ability for customers to reduce bills through conservation and consumption  
7 reduction. Reducing the ability to decrease bills through conservation while at the same time  
8 increasing the amount paid through the fixed charge is particularly problematic for low-income  
9 customers, given that low income households have significantly less budget elasticity than higher  
10 income households. Furthermore, increasing the fixed charge that a residential customer must  
11 pay, without any link to a customer’s usage, also undermines the goals of the Low Income Usage  
12 Reduction Program (LIURP) -- which is specifically designed to lower consumption and increase  
13 energy affordability for low income customers.

14 On June 10, 2015, The National Association of State Utility Consumer Advocates  
15 (NASUCA) passed a resolution opposing efforts to increase fixed customer charges for  
16 distribution services.<sup>28</sup> In the resolution, NASUCA explains that “low-income customers (with  
17 incomes at or below 150% of the federal poverty level) on average use less [energy] than the  
18 statewide residential average and less than their higher-income counterparts.”<sup>29</sup> NASUCA notes  
19 that elderly and minority customers, who are disproportionately low income,<sup>30</sup> also use less

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<sup>27</sup> UGI Statement 6, Lahoff, at 23.

<sup>28</sup> Nat’l Ass’n of State Utility Consumer Advocates, Customer Charge Resolution, 2015-1 (June 10, 2015)

<sup>29</sup> *Id.*

<sup>30</sup> Pathways PA, *Overlooked and Undercounted: How the Great Recession Impacted Household Self-Sufficiency in Pennsylvania* (Oct. 2012) (“While the majority of families with inadequate income in Pennsylvania are White, people or color are disproportionately likely to have inadequate incomes, particularly Latinos and African

1 energy on average than their younger and Caucasian counterparts, respectively. By imposing a  
2 higher fixed charge, low income elderly and minority populations will suffer the largest, most  
3 detrimental economic impact – and will simultaneously lose the ability to offset unaffordable  
4 costs by participating in energy efficiency and/or conservation programming.

5 **Q: Proponents of a higher fixed charge argue that the pricing structure is beneficial to**  
6 **customers because the rates are easier to understand and provide enhanced predictability.**

7 **How do you respond?**

8 A: It is true that shifting cost recovery from a variable, volumetric-based rate to a fixed  
9 charge will produce bills which are easier to understand and are more predictable. But a simple,  
10 predictable bill only provides low income customers with a meaningful benefit if it also produces  
11 an affordable bill. A change which results in a bill that is predictable and easily understood, but  
12 at the same time increases costs to a low-income household, produces a negative result.

13 For CAP customers, with bills structured and intended to be fixed at an affordable level,  
14 stability and predictability can serve as meaningful budgeting tools. However, for low-income  
15 customers who are not enrolled in CAP, bill stability of an already unaffordable bill will not, by  
16 virtue of stability alone, provide a benefit to the customer.

17 A shift to a higher fixed customer charge will significantly reduce the ability to have  
18 appreciable bill savings through energy efficiency and conservation. For poor households, this  
19 matters. As I described above, poor households struggle on a monthly basis to pay all of their  
20 bills, often choosing to forego food or medicine in order to keep service connected.

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Americans. ... Since the Great Recession, the proportion of households with inadequate income has increased the most for race / ethnic groups of color.”).

1 **Q. Proponents of a higher fixed charge also argue that a fixed fee is appropriate**  
2 **because the Company’s costs are mostly fixed. Do you agree?**

3 No. Charging the same flat fixed rate for distribution service inequitably assigns  
4 distribution costs on low usage customers, who are often those least able to afford the cost of  
5 energy, without any corresponding benefit or service enhancement. In turn, as mentioned above,  
6 fixed customer charges undermine the overarching policy goal of decreasing energy  
7 consumption through targeted energy efficiency and conservation programming.

8 A higher fixed charge would place the highest financial burden on low income customers,  
9 who often reside in small multifamily units with fewer square feet to accomplish effective  
10 consumption reduction, and who have an inelastic budget which is unable to absorb an increase  
11 in fixed fees.<sup>31</sup> While energy efficiency and weatherization measures to reduce usage are free for

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<sup>31</sup> “Multifamily housing, generally defined as residential buildings with 5 or more units, is an important part of America’s low income housing supply. It houses about a quarter (27.3%) of all households with incomes below the poverty line, 28.4% of all very low income families and nearly half (48.9%) of all very low income renters.” Gary Pivo, Energy Efficiency and its Relationship to Household Income in Multifamily Rental Housing (Sep. 2012), [https://www.fanniemae.com/content/fact\\_sheet/energy-efficiency-rental-housing.pdf](https://www.fanniemae.com/content/fact_sheet/energy-efficiency-rental-housing.pdf).

According to the most recent data from the United States Department of Energy, low income households in the Northeast region use less natural gas per square foot than households with higher incomes. US DOE, Residential Energy Consumption Survey, T. CE2.2, <https://www.eia.gov/consumption/residential/data/2009/index.cfm?view=consumption>.

See also Appendix D, Roger Colton, Home Energy Consumption Expenditures by Income (Pennsylvania) (May 2009).

The data showing a direct relationship between income and home energy consumption in Pennsylvania is compelling. The differences that are evident in the data are not small. Low income customers have lower usage not only as compared to high-income customers, but also when compared to average customers as well. In addition, the national data is consistent. The national data developed by the U.S. DOE, the regional data developed by the U.S. DOL, and the state-specific data developed by the Census Bureau all find the same relationship. Finally, the data is internally consistent. While DOE reports that income is related to home energy usage because of differences in housing unit sizes, that relationship is confirmed when housing unit size is overlaid on income and home energy expenditures in the Pennsylvania using state-specific data.

Id. at 8.

1 a very small portion of this population through LIURP programming, the measures installed will  
2 be less effective at achieving additional savings for this population if fixed service charges  
3 increase.

4 **Q: Do you have any recommendations that could help mitigate the disproportionate**  
5 **impact of UGI’s rate design on low-income households?**

6 A: Yes. For the reasons explained above, I recommend that if any increase in the residential  
7 rate is approved, that increase should be applied to the volumetric charge. I also recommend that  
8 UGI expand and significantly improve its universal service programming to mitigate the harm to  
9 this vulnerable population of any increased charges.

10 **UNIVERSAL SERVICE PROGRAMS**

11 **Q: UGI Witness Robert Stoyko explained in direct testimony that “UGI is not**  
12 **proposing any changes to any of its Commission-approved universal service programs.”**  
13 **UGI Statement 7 at 10. How do you respond?**

14 A: UGI is proposing to increase residential rates by nearly 20% just a year after its Universal  
15 Services and Energy Conservation Plan was approved by the Commission. As I explained  
16 above, UGI has the lowest CAP enrollment rates compared to other Natural Gas Distribution  
17 Companies. It also has much higher than average termination rates for its confirmed low income  
18 customers – and much lower corresponding reconnection rates – than the average termination  
19 and reconnection rates of Pennsylvania NGDCs. Recognizing UGI’s programmatic lag, the  
20 Commission required UGI to lift its maximum CAP enrollment and increase its LIURP

1 spending.<sup>32</sup> However, in assessing the appropriateness of UGI’s universal service programming  
2 to serve its low income population, the Commission did not consider the impact that a significant  
3 increase in rates such as the one proposed would have on UGI’s low income customers and the  
4 concomitant increase in the need for the programs. At the time UGI’s USECP was approved,  
5 there was no indication that rates would skyrocket in the following years. Indeed, the influx of  
6 natural gas into the state through Marcellus Shale drilling promised to keep rates low for the  
7 foreseeable future. But now, UGI is requesting to not only raise rates by nearly 20% -- it is in  
8 requesting to raise the unavoidable portion of a residential customer’s bill (the fixed charge) by  
9 104%, from \$8.55/month to \$17.50/month.

10 To mitigate the potentially significant harm to low income residential ratepayers, it is  
11 critical that UGI expand its Universal Service programs to meet the increased need for  
12 programming that is certain to result.

13 **Q: Do you have any general observations about UGI’s Universal Service Program**  
14 **portfolio?**

15 A: Yes. UGI’s dual CAP and LIURP program enrollment levels are very low, which  
16 indicates to me that more coordination between the programs is needed to ensure that customers  
17 are able to adequately access the full range of available programming. In 2012, 84 customers  
18 were enrolled in both CAP and LIURP; in 2013, 47 were enrolled in both CAP and LIURP; and  
19 in 2014, 59 were enrolled in both CAP and LIURP.<sup>33</sup> UGI’s portfolio of universal program –

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<sup>32</sup> UGI USECP 2014-2017, Docket No. M-2013-2371824, Order Approving Joint Settlement (June 11, 2015) & Order on Elimination of CAP Enrollment Limits (September 5, 2015).

<sup>33</sup> Appendix B (Response of UGI to CAUSE-PA I-14 and attachments 1, 2, and 3).

1 particularly LIURP and CAP – are meant to work together to ensure that customers are receiving  
2 bill assistance and usage reduction services, two primary components of sustained energy  
3 affordability. Before any increase is granted, UGI should be required to take steps to increase its  
4 coordination between its low income programs, and to increase the amount of LIURP available  
5 to ensure that its low income customers are able to achieve long term financial stability.

6 **CUSTOMER ASSISTANCE PROGRAM (CAP)**

7 **Q: In reviewing UGI’s CAP, do you have any concerns with the program?**

8 A: Yes. In its last USECP proceeding, UGI was ordered to remove its CAP enrollment limit  
9 in an attempt to bolster enrollment rates.<sup>34</sup> But since the order went into place in September  
10 2015, CAP enrollment has actually gone down – not up.<sup>35</sup> Lifting enrollment rates expanded the  
11 program capacity, but did nothing to change the policies and practices – such as insufficient  
12 outreach, referral, and screening efforts – that cause the dearth in enrollment. Even bringing  
13 CAP enrollment up to par would not remediate the additional harm to low income residential  
14 customers that would result from UGI’s proposed rate increase. More outreach, reporting, and  
15 programmatic oversight is needed to ensure that UGI’s low income population is able to access  
16 adequate assistance through CAP.

17 One problem I see in reviewing UGI’s CAP is that UGI has outsourced all of its CAP  
18 outreach and processing to Community Based Organizations. While I fully support use of CBOs,

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<sup>34</sup> UGI 2014-2017 USECP, Order on Elimination of CAP Enrollment Limits, Docket M-2013-2371824 (Sept. 3, 2015).

<sup>35</sup> Appendix B (Response UGI to OCA III-4 and attachment). On the last day of September, 2015, CAP enrollment was at 9,257, but on the last day of January, 2016, CAP enrollment declined to 7,843. *Id.*

1 as they are located within the community they serve and are often best suited to conduct outreach  
2 and intake with proper sensitivity, UGI's model relies too heavily on these organizations to  
3 administer the program without providing the support necessary to serve this population.  
4 Moreover, UGI has unduly restricted and deterred CBOs from conducting any positive outreach,  
5 which is likely contributing to UGI's significantly lower than average CAP enrollment rates.

6 **\*\*BEGIN PROPRIETARY\*\***

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**\*\*END PROPRIETARY\*\***

In terms of other CAP outreach, UGI conducts an annual “cross-referral” process, in which it mails a CAP application to customers who received LIHEAP in the previous year.<sup>41</sup> When asked whether UGI followed up with customers after sending an application, UGI indicated that “[a]ny customer inquiries or follow up actions were completed by the Company’s agencies.”<sup>42</sup> In other words, it appears there is no follow up unless the customer is in active arrears with UGI. From what I can tell in reviewing UGI’s policies and USECP, its CAP outreach is largely limited to this yearly mailing of CAP applications, which is not tracked or subject to any follow-up. Because CBOs generally operate numerous low income programs at the local level, they have a unique expertise that could be relied on to access, expand outreach, and facilitate increased low-income participation in CAP. UGI should rely on this CBO expertise and provide incentives to expand outreach and customer contacts, not limit the opportunity for success by unduly limiting program implementation.

**Q: Do you have any recommendations for how UGI could improve its CAP and mitigate the harm of a rate increase on low income customers?**

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<sup>41</sup> Appendix B (Response of UGI to CAUSE-PA I-11 and attachments -1, -2, -3, and -4).  
<sup>42</sup> Appendix B (Response of UGI to CAUSE-PA III-11).

1 A: UGI should be required to take concrete steps to bolster its CAP enrollment rates.  
2 In addition to making specific policy changes to encourage positive customer outreach and  
3 recruitment into the program, UGI should also be required to make referrals and screen for CAP  
4 eligibility during all credit and bill-related calls. In addition, UGI employees should either be  
5 able to conduct the CAP enrollment at the time of the screening/referral, or be able to transfer a  
6 customer call directly to a CBO to process a CAP application over the phone – without having to  
7 instruct the customer to call a different phone number. Finally, UGI should enhance its efforts to  
8 coordinate its universal service programs across its portfolio and with other state and utility-run  
9 assistance programs to leverage funding and provide holistic assistance to low income customers  
10 that will help reduce their bills and promote financial stability over the long term.

11 **LOW INCOME USAGE REDUCTION PROGRAM (LIURP)**

12 **Q: Do you have any concerns about UGI's LIURP?**

13 A: When properly funded and administered, LIURP has the potential to significantly reduce  
14 low income customer bills over the long term. But until recently, UGI's LIURP has been  
15 seriously underfunded compared to other NGDCs. From 2010-2013, UGI completed 588  
16 weatherization jobs;<sup>43</sup> and in 2014 and 2015, UGI completed a combined 194 LIURP jobs. In 5  
17 years, that amounts to just 782 households served. As of January 1, 2016, UGI's LIURP budget  
18 was increased by \$450,000; however, this increase was based on UGI's former rates, and does  
19 not take into account the increased need for services to reach affordability after a rate increase.

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<sup>43</sup> UGI 2014-2017 USECP at 25.

1           UGI’s recent increase in LIURP funding does not necessarily translate to an increase in  
2 completed jobs. As of April 1, 2016 – three months since the increased budget went into effect –  
3 UGI has completed LIURP services for just six homes: three (3) single family homes and three  
4 (3) individually metered multifamily units (apartments).<sup>44</sup> No services have been completed for  
5 manufactured homes. UGI’s track record for LIURP job completion does not inspire confidence  
6 in its ability to significantly increase its job pacing: In 2014, UGI conducted 88 jobs at a cost of  
7 \$529,676 – a full \$130,548 under budget.<sup>45</sup> Yet – despite UGI’s underspending – the need for  
8 program services is great: UGI estimates that approximately 7,449 customers are in need of  
9 LIURP services.<sup>46</sup>

10           Before any increase in rates is approved, UGI should be required to take affirmative steps  
11 to increase its LIURP production to meet the needs of its customers. As I explained, the impact  
12 of a rate increase will be felt most immediately and directly by low income customers who are  
13 not enrolled in CAP. Connecting this population to LIURP is critically important to help these  
14 customers to connect and maintain their natural gas service.

15           Given this significant unmet need, it is reasonable to incrementally increase UGI’s  
16 LIURP commensurate with the percentage that a customer’s overall bill would increase as a  
17 result of any increase granted in this base rate proceeding. Thus, effective with the date that  
18 rates are put into place, I recommend that UGI be required to increase its LIURP budget  
19 commensurate with the percentage increase to low-income customers at or below 150% FPL

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<sup>44</sup> Appendix B (Response of UGI to CAUSE-PA IV-2 and attachment).

<sup>45</sup> UGI 2014-2017 USECP at A-4, A-5 (projecting 94 LIURP jobs at a budget of \$660,224); Pa. PUC, BCS, Report on 2014 Universal Service Programs and Collections Performance, at 38-39 (2015) (reporting actual 2014 LIURP spending by UGI at \$529,676 for a total of 88 completed jobs).

<sup>46</sup> UGI 2014-2017 USECP at B-1.

1 which is awarded in rates. That is, if UGI is awarded a rate increase which results in an average  
2 increase of X% for non-CAP low-income households, then its LIURP budget should increase by  
3 at least this amount.

4 **CUSTOMER ASSISTANCE AND REFERRAL EVALUATION SERVICES (CARES)**

5 **Q: Do you have any concerns about UGI’s CARES Program?**

6 A: Yes. CARES has a relatively small budget and serves a small portion of customers, but is  
7 supposed to serve an important role in addressing customers with an acute financial hardship.  
8 CARES is designed, as UGI states in its policy, to “provide personal assistance and referrals to  
9 payment-troubled customer and to help improve their bill payment problems.” It was originally  
10 intended to serve as an intensive case management program where customers with an acute  
11 hardship could receive additional assistance – including referrals to local agencies and  
12 organizations that may be able to address the customer’s underlying hardship.<sup>47</sup> In reviewing  
13 UGI’s CARES procedures and budget, it seems that UGI’s CARES is not being appropriately  
14 utilized to adequately assist UGI’s vulnerable population. Instead of using the program to do  
15 intensive case review and provide additional assistance, the overwhelming majority of UGI’s  
16 CARES budget is spent on advertising. From 2013 to 2015, the overall CARES program  
17 expenditures amounted to \$208,034, of which a total of \$120,968 was spent on advertising.<sup>48</sup>  
18 While advertising is a critical aspect of each universal service program, and should be  
19 encouraged for each program to ensure that all eligible populations are aware of and informed

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<sup>47</sup> UGI Statement 7, Stoyoko, at 13.

<sup>48</sup> Appendix B (Response of UGI to CAUSE-PA V-12 and attachment).

1 about their options, the CARES budget should not be used to fulfill advertising needs for other  
2 programs.

3 In reviewing the cases that are handled by CARES, it is clear that CARES customers are  
4 not provided with the sort of holistic case management and referral assistance that should be  
5 available through CARES. Of the 118 customers listed as having received CARES service in  
6 2015, ninety-five (95) received a grant through Operation Share; thirteen (13) received a  
7 LIHEAP Cash Grant; nineteen (19) received a LIHEAP Crisis Grant; seven (7) were enrolled in  
8 CAP; and zero (0) were enrolled in LIURP.<sup>49</sup> Just forty-seven (47) of the accounts listed  
9 contained household income and occupancy data.<sup>50</sup> According to the income and household data  
10 collected on these 47 accounts, every single customer met the income eligibility guidelines for  
11 LIHEAP, CAP, Operation Share and LIURP.

12 The vast majority of customers processed through CARES are able to get their service  
13 turned on and/or a pending termination stayed, and most are referred to Operation Share.  
14 According to policy, CARES customers are also sent a referral packet which contains various  
15 program brochures, with a cover letter which states:

16 Enclosed is information from UGI Cares Department.

17 The information enclosed is tips on energy savings, safety and also information on the  
18 UGI Universal Services Programs.

19 Please take time to review the packet information. If you have any questions, please call  
20 UGI at 1-800-UGI-Warm.<sup>51</sup>

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<sup>49</sup> Appendix B (Response of UGI to CAUSE-PA III-5-a and attachment 5-a).

<sup>50</sup> *Id.*

<sup>51</sup> Appendix B (Response of UGI to CAUSE-PA III-5-b and attachment 5-b-1).

1 These basic referral and customer assistance activities are good practice – but should be standard  
2 when dealing with any customer who is having difficulty paying their bills, and in fact just meet  
3 the minimum referral requirements contained in Chapter 14 for all payment troubled  
4 customers.<sup>52</sup>

5 CARES presents an opportunity for UGI to provide support for its customers in accessing  
6 all of the programs available to the customer. At the very least, it provides an opportunity for  
7 UGI to verify a customer as low income so that they are not later terminated in the winter.  
8 Instead, fewer than half of the customers served through CARES are even questioned about their  
9 household income and occupancy. CARES also provides a ready pipeline for CAP enrollment  
10 and LIURP jobs. But rather than work with the customer to leverage available programming that  
11 will promote the customer’s long-term financial stability, UGI gives the customer a cash grant to  
12 temporarily fix their problem and sends them a packet of brochures. This is not the sort of  
13 individualized and intensive assistance intended to be provided through CARES.

14 **Q: Do you have any recommendations to improve CARES?**

15 **A:** Yes. UGI should devote sufficient resources for a dedicated staff person with expertise  
16 in social work to handle CARES. This person should work with clients individually to enroll  
17 them in appropriate programs within UGI’s portfolio of Universal Service programs and to refer  
18 them to agencies and services across the community – including Area Agencies on Aging,

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<sup>52</sup> 66 Pa. C.S. § 1410.1(1)-(2).

1 domestic violence programs, budget counseling and career development programs, drug and  
2 alcohol counseling, health clinics, and other social service organizations and agencies.

3 **UGI PRACTICES, POLICIES, AND PROCEDURES**

4 **Q: You explained at the start of your testimony that you also wish to address UGI's**  
5 **policies, practices, and procedures which govern access to UGI's service. Can you please**  
6 **summarize the policies, practices, and procedures you wish to address?**

7 A: I plan to address UGI's inadequate procedures with regard to its identification of low  
8 income customers; deficient security deposit waiver requirements; and medical certification  
9 procedures.

10 **Q: What would you like to address about UGI's identification of low income**  
11 **customers?**

12 A: Put simply, UGI is not adequately identifying and tracking its low income customers –  
13 and in fact has policies in place which actively prevent its call center employees from  
14 determining a customer's income level and tracking the customer in the system. Low income  
15 customers are entitled to several important statutory and regulatory protections to ensure that  
16 they are able to access and maintain safe utility service. For example, CAP-eligible customers  
17 cannot be charged a security deposit to connect to or maintain service<sup>53</sup> and all households with  
18 incomes below 250% of the federal poverty income guidelines cannot be terminated from  
19 December 1 through March 31 during the winter moratorium.<sup>54</sup> UGI will not be able to fully

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<sup>53</sup> 66 Pa. C.S. § 1404(a.1) (Cash deposit prohibition).

<sup>54</sup> 66 Pa. C.S. § 1406(e).

1 protect these customers, as it is mandated to do, if it does not first identify the customer as low  
2 income in their system.

3           Compared to equivalent NGDCs, UGI has a significantly lower percentage of customers  
4 identified as low income in its system. In 2014, Peoples Natural Gas and UGI had nearly the  
5 same number of residential customers and estimated low income customers.<sup>55</sup> Yet Peoples  
6 confirmed 18% of its residential customers as low income, while UGI confirmed just 12.6% of  
7 its residential customers as low income.<sup>56</sup> It is also noteworthy that UGI’s confirmed low  
8 income population has declined in recent years – despite steady poverty rates across the state and  
9 in UGI’s service territory. Since 2014, UGI’s confirmed low income customer count  
10 inexplicably decreased from 41,639 to 35,100.<sup>57</sup>

11           UGI’s internal policies and practices are impeding the identification of low income  
12 customers and, in turn, the application of protections for low income customers that reside within  
13 its service territory. For example, UGI employees received updated policies on December 22,  
14 2014, which explained the security deposit waiver for low income households, but forbid  
15 employees from asking for income information from applicants, instructing:

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<sup>55</sup> PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 6, 8 (2015), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2014.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf).

Peoples’ Residential Gas Customers, 330,459; UGI Residential Gas Customers, 331,583.  
Peoples Estimated Low Income Customers, 85,919; UGI Estimated Low Income Customers, 84,809.

<sup>56</sup> PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 6-7 (2015), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2014.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf).

<sup>57</sup> PUC, Bureau of Consumer Svcs. *2014 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies*, at 7 (2015), available at [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2014.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2014.pdf); see also Appendix B (Interrogatory Response CAUSE-PA I-4 and attachment).

- 1 • **You will not ask** for income verification on an initial application.
- 2 • If not already confirmed eligible for a customer assistance program and a
- 3 deposit is required due to a customer’s poor payment history, **you will quote**
- 4 **the deposit.**
- 5 • If an applicant states they are not able to afford the deposit and provide you
- 6 with detailed information about their income that implies they are low-
- 7 income, the deposit should be waived.<sup>58</sup>

8 The public utility code specifically forbids imposing a security deposit for any household that is  
9 confirmed to be CAP-eligible.<sup>59</sup> Through its policy, UGI avoids this obligation by not inquiring  
10 about CAP eligibility and in fact even when it knows about CAP eligibility, adding an  
11 eliminating condition based upon poor payment history, which totally negates the intent of the  
12 statutory change. In my judgment, refusing to inquire regarding CAP eligibility unless the  
13 household raises the issue and adding an impermissible disqualifying factor of poor payment  
14 history violates the intent and language of the recently enacted provision in question. UGI’s  
15 policy not only “hides the ball” from the low income customer by requesting a security deposit  
16 without explaining that a waiver may be obtained, it explicitly forbids employees from inquiring  
17 with the customer whether a waiver might apply. A customer is only given information about  
18 the waiver after disclosing that they are low income – without prompting from the UGI  
19 employee – and providing “detailed information” about their income. But low income customers  
20 are typically not aware that being low income would entitle them to a security deposit waiver,  
21 and are thus unlikely to disclose their status as a low income customer without first being  
22 informed of the possibility of waiver.

23 UGI’s policy prohibiting employees from asking about an applicant or customer’s  
24 income creates a domino effect: Low income customers are not identified when they set up

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<sup>58</sup> Appendix B (Response of UGI to CAUSE-PA II-25 and attachment)

<sup>59</sup> 66 Pa. C.S. 1404(a.1).

1 service, and are charged a security deposit - which they are most likely unable to pay without  
2 sacrificing other essentials such as housing, food, and medicine. Unable to pay the security  
3 deposit, the customer falls behind on their monthly bill and is at risk of termination.<sup>60</sup>

4 Further, it appears from reviewing UGI's call center training documents that it is UGI's  
5 policy to remove low income identifiers from customer accounts after 1 year – which perhaps  
6 explains the drastic decrease in confirmed low income customers since 2014 that I noted above.  
7 In identifying the information a call center employee should gather to establish a new account,  
8 step 7 provides:

9 Number of people, including children, residing at the property. (Use the income  
10 guidelines chart to determine if the household income is below poverty level). A  
11 low income guidelines chart is given to the CCR every year. ... **If the customer is**  
12 **low income, the mail screen will display Low Income along with an expiration**  
13 **date which is one year from the date the account automates.**<sup>61</sup>  
14

15 The policy does not indicate that income is ever requested, so it is unclear how an employee  
16 performs the income calculation – especially in light of the policy I explained above which  
17 prohibits call center employees from asking for income information. But that issue aside, UGI's  
18 removal of customers from low income designation in their system after one year is  
19 inappropriate. There is no indication that any follow-up is performed to identify whether a  
20 customer has increased their income above 150% FPL over a twelvemonth period.

21 Policies such as those described above are unduly restrictive and prevent low income  
22 consumers from accessing and maintaining affordable natural gas service through assistance

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<sup>60</sup> The hope would be that the customer would then be referred to CAP and other universal services. But, without indication that the customer is low income in the system, most end up in the termination process without ever being referred to UGI's universal service programs. Ms. Kay Pickering explained at the public input hearing that many of the clients she serves were not referred to universal service programs before being terminated, and eventually being connected with her program to find assistance. (March 31, 2016, 1:00 pm Public Input Hearing).

<sup>61</sup> Appendix B (Response of UGI to CAUSE-PA II-8 and attachment, at 3 (emphasis added)).

1 programs like CAP. The negative impact of such policies will be compounded if rates were to  
2 also increase. Before any rate increase is approved, UGI should be required to extensively revise  
3 its policies and procedures to proactively identify low income customers during any and all  
4 points of non-emergency customer contact. Doing so will ensure that the statutory protections  
5 provided to low income customers – including security deposit waivers and the winter  
6 moratorium - are appropriately implemented and administered throughout UGI’s service  
7 territory.

8 **Q: You mentioned security deposit waivers above in discussing UGI’s policies for**  
9 **identifying low income customers. Is there anything else regarding UGI’s security deposit**  
10 **waiver policy that you would like to address?**

11 A: Yes. UGI’s policy allows waiver for CAP eligible customers, but *requires* the  
12 customer to then enroll in a universal service program or be subject to a future security deposit.  
13 According to UGI’s policy, if a security deposit is waived based on the applicant’s income, UGI  
14 employees are required to: “[e]xplain to the customer that failure to enroll into a customer  
15 assistance program or pay on time, they may be assessed a deposit at a later date.”<sup>62</sup> This policy  
16 is only found in an update dated 12/22/2014, and is not reflected in its training materials used to  
17 educate staff about policies and procedures for establishing service.<sup>63</sup>

18 The security deposit waiver provides the following: “[N]o public utility may require a  
19 customer or applicant that is confirmed to be eligible for a customer assistance program to  
20 provide a cash deposit.”<sup>64</sup> There is no requirement that a customer enroll in a customer assistance

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<sup>62</sup> Appendix B (Response of UGI to CAUSE-PA II-25 and attachment, at 1).

<sup>63</sup> Appendix B (Response of UGI to CAUSE-PA II-8 and attachment).

<sup>64</sup> 66 Pa. C.S. 1404(a.1).

1 program, they must merely be “confirmed to be eligible.” Likewise, the exemption explicitly  
2 applies to both applicants and customers, and does not provide for later assessment of a security  
3 deposit if the eligible customer is late making a bill payment.

4 While I believe that low income consumers would benefit from enrollment in a Universal  
5 Service program, there may be valid reasons for a particular customer not to enroll and that  
6 decision is up to the customer. As I explained at the start of my testimony, low income customers  
7 pay a disproportionately high percentage of their income on energy costs, and often go without  
8 other basic necessities – such as food and medicine - to make ends meet. An upfront security  
9 deposit – above and beyond the monthly bill – presents an insurmountable barrier for many low  
10 income households attempting to connect to natural gas service.

11 The law does not restrict security deposit waiver to those enrolled in a customer  
12 assistance program. Charging a security deposit for failure to enroll in a customer assistance  
13 program unnecessarily restricts the ability for low income consumers to access and maintain  
14 their natural gas service. As such, UGI’s requested rate increase should not be approved unless  
15 and until UGI revises its policies to ensure that low income customers are able to connect to and  
16 maintain their service without being forced to pay prohibitive up-front costs.

17 **Q: What would you like to address about UGI’s Medical Certification process?**

18 A: I am concerned that UGI’s medical certificate process creates a dangerous situation for  
19 medically vulnerable customers.

20 First, UGI’s medical certification process inappropriately limits the number of times that  
21 a customer may renew a medical certificate. In relevant part, UGI’s policy provides:

22 If there has already been 1 medical certification and 2 renewals, review the account to see  
23 if the delinquent balance had been satisfied.

- 24
- If the balance was satisfied, the customer is eligible

- 1           • If the balance was not satisfied, the customer is not eligible.<sup>65</sup>

2           This policy is not in accord with Commission policy set during the Commission’s  
3 Chapter 56 rulemaking in 2011, which provides that a customer of a regulated utility may  
4 continue to renew a medical certificate provided they pay the *current* amount due – not the entire  
5 account balance.<sup>66</sup> The Commission explained the reason for its decision:

6           We also understand FirstEnergy’s concerns with the payment of the outstanding  
7 balance. In response, we point out that **if the customer is paying their current**  
8 **bills as required by this section, the outstanding balance will not be increasing,**  
9 **meaning that the customer’s and the utility’s problems with the account**  
10 **balance will not be aggravated.** We expect that once the medical certificate  
11 expires, the utility would address the outstanding balance with the customer. We  
12 also point to the petition process at § 56.118 that a utility may use to possibly void  
13 a medical certificate that a utility believes is being used to avoid the payment of the  
14 account balance. We must also reject PPL’s advice because their suggestion that  
15 we require an arrangement on all current and overdue balances might be considered  
16 a payment agreement, which may conflict with Section 1405(d)’s restrictions on  
17 the Commission’s authority to order payment agreements.<sup>67</sup>

18          The Commission reiterated this explanation in its Final Order regarding Chapter 14  
19 Implementation and concluded that its policy in 2011 remains valid today and must be adhered  
20 to by regulated utilities until a future rulemaking:

21          Until [a future Chapter 56 rulemaking], we reiterate what we said in the 2011 rulemaking  
22 and in the current 52 Pa. Code § 56.116: that customers ‘shall retain a duty to make  
23 payment on all current undisputed bills or budget billing amount...’ while under the  
24 protection of a medical certificate. We further reiterate that this means the current bill (or  
25 budget bill) amount must be paid in full by the due date.<sup>68</sup>

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<sup>65</sup> Appendix B (Response of UGI to CAUSE-PA II-11 and attachment).

<sup>66</sup> *Revised Final Order, Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Provisions of 66 Pa. C.S., Chapter 14; General Review of Regulations*, Docket No. -00060182, at 49 Attach. 1 (Order Entered June 13, 2011).

<sup>67</sup> *Id.*

<sup>68</sup> Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 14-15 (July 9, 2015).

1           UGI’s internal policy directly contravenes Commission policy and requires the full  
2 balance – including arrears – be paid by a customer prior to allowing a 4<sup>th</sup> medical certificate  
3 renewal, and creates a serious risk of creating substantial medical consequences for the customer  
4 or their household member. When a customer submits a medical certificate, they are doing so  
5 because someone in their household is seriously ill or requires service to treat a medical  
6 condition. As I explained above, the process for obtaining a medical certificate is onerous, and  
7 requires a physician, physician assistant, or nurse practitioner to be personally invested in the  
8 process. The Commission’s policy – recognizing the extreme hardship a family faces when they  
9 must resort to the medical certification process – holds the customer responsible for the current  
10 charges, but places the remainder of the balance on hold until the medical emergency subsides.  
11 UGI should be required to uphold this same policy to ensure that its customers are able to access  
12 service with the same rights and obligations of customers in other utilities across the state.

13           In addition to the incorrect renewal policy, the process for submitting a medical  
14 certificate is otherwise unduly restrictive, and likely prohibits customers from accessing medical  
15 certificate relief in a reasonable manner. UGI’s policy provides that the doctor’s office must call  
16 UGI directly: “Customer should be advised to have the doctor’s office call UGI immediately.”<sup>69</sup>  
17 While an exception is made for the doctor’s office to request UGI’s form via email or fax, the  
18 customer is explicitly prohibited from obtaining the form to bring to their doctor’s office for  
19 signature: “UGI will not fax a medical certification form directly to the customer.”<sup>70</sup>

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<sup>69</sup> Appendix B (Response of UGI to CAUSE-PA II-11 and attachment)

<sup>70</sup> *Id.* In its Chapter 14 Implementation Order, the Commission was explicit that “Utilities that develop ... a form are encouraged to make these readily available to medical professionals **and customers**, including placement on the utility’s website.” Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 15 (July 9, 2015) (emphasis added).

1           It can be difficult and often expensive for low income customers to get an appointment  
2 with their physician, physician’s assistant, or nurse practitioner within the requisite 3 days.<sup>71</sup> In  
3 addition to securing a last-minute appointment, the customer must often take off work, secure  
4 childcare, arrange transportation, and/or pay a large deductible or copay simply to get in to talk  
5 with their treating physician, physician assistant, or nurse practitioner. The additional burden of  
6 asking the physician, physician’s assistant, or nurse practitioner to call UGI directly to obtain a  
7 form adds needlessly to the already burdensome regulatory requirements.

8           Finally, UGI’s medical certificate policy – as written – gives the impression that its form  
9 is required, which is again directly contrary to Commission policy which allows a certifying  
10 professional to produce any written document which contains the required information –  
11 regardless of the form used.<sup>72</sup> UGI states in its policy that it will accept a “note on a prescription  
12 pad or a doctor’s office letterhead, including all of the required information” – but it does not  
13 provide any notice to the customer or the doctor that this alternative is acceptable. Likewise, its  
14 exception fails to note that any writing – not just a writing on letterhead or prescription pad – is  
15 sufficient. In fact, when the doctor’s office calls UGI, UGI’s call center employees are  
16 instructed: “Advise the doctor’s office that the form must be completed and returned to UGI as  
17 soon as possible to avoid interruption of service; or to restore service.”<sup>73</sup> No alternative options  
18 are explained to the certifying professional. As a practical matter, UGI’s process for medical

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<sup>71</sup> According to a recent study of health care provider wait times revealed that the average wait-time for a medical appointment with a family practice physician was 21 days. Merritt Hawkins, Physician Appointment Wait Times and Medicaid and Medicare Acceptance Rates: 2014 Survey, at 11 (2014), *available at* <http://www.merrithawkins.com/uploadedFiles/MerrittHawkins/Surveys/mha2014waitsurvPDF.pdf>.

<sup>72</sup> Appendix B (Response of UGI to CAUSE-PA II-11 and attachment, at 2); Chapter 14 Implementation, Final Order, Docket No.M-2014-2448824, at 15 (July 9, 2015) (“Utilities may develop a [medical certificate] form and encourage its use – but its use cannot be mandatory.”).

<sup>73</sup> Appendix B (Response of UGI to CAUSE-PA II-11 and attachment, at 2).

1 certification imposes a form requirement on customers attempting to submit a medical certificate  
2 to prevent termination of service when they are seriously ill or need service to treat a medical  
3 condition. This is inappropriate. UGI must revise its medical certificate policy to accept any  
4 written document which contains the required information and to eliminate inference that UGI's  
5 medical certificate form is required.

6 **ENERGY EFFICIENCY AND CONSERVATION PLAN**

7 **Q: Have you reviewed UGI's proposed Energy Efficiency and Conservation Plan?**

8 A: Yes, to the extent that it addresses low income populations.

9 **Q: How does UGI's proposed Energy Efficiency and Conservation Plan address low**  
10 **income populations?**

11 A: The short answer is: It doesn't. UGI witness Theodore Love explains:

12 Low income customers are allowed to participate in any of the programs open to  
13 residential customers. Although no program in the proposed EE&C portfolio specifically  
14 targets this market segment, UGI Gas already has a Low Income Usage Reduction  
15 Program ("LIURP") as discussed in the direct testimony of Robert R. Stoyko (UGI Gas  
16 Statement No. 7).

17 **Q: Do you have any concerns about UGI's lack of targeted low income programs in its**  
18 **EE&C Plan?**

19 A: UGI models its proposed programming on Act 129 energy efficiency and conservation  
20 programming,<sup>74</sup> but has completely ignored a major component of Act 129: The recognition that  
21 low income customers are unable to access most residential programs because the upfront cost of

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<sup>74</sup> UGI Statement 11, Love, at 3-4.

1 participation is prohibitive.<sup>75</sup> In Phase III of Act 129 – which is set to go into effect as of June 1,  
2 2016 – the Commission required electric companies create programming for low income  
3 customers capable of producing 5.5% of its overall savings.<sup>76</sup>

4         The vast majority of low income customers (those not enrolled in CAP) will pay UGI’s  
5 proposed “EE&C Rider.”<sup>77</sup> But as a practical matter, this group of customers will be foreclosed  
6 from participating in the programming. To prevent an unjust result, UGI should either exempt  
7 its confirmed low income customers from paying the EE&C Rider, or increase LIURP funding  
8 by the amount collected from low income customers.

9         In addition to exempting low income customers from the EE&C Rider – or apportioning  
10 those funds to LIURP – UGI should use the EE&C programs to generate LIURP referrals.  
11 Customers inquiring about the EE&C program should be screened for LIURP eligibility and  
12 should be referred.

13 **CONCLUSION**

14 **Q: Please summarize your conclusions and recommendations**

15 A: Before any rate increase is approved, UGI should be required to make the following  
16 changes and/or revisions to ensure that low income customers are able to access natural gas service  
17 within UGI’s service territory at just and reasonable rates and terms:

- 18         • Reject UGI’s proposal to increase its fixed customer charge, and apply any approved  
19 increase to the volumetric charge.

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<sup>75</sup> See 66 Pa. C.S. § 2806.1(b)(i)(G).

<sup>76</sup> Energy Efficiency and Conservation Program, Phase III Implementation Order, Docket M-2014-2424864, at 69 (entered June 19, 2015).

<sup>77</sup> UGI Statement 6, Lahoff, at 19.

- 1       • Increase coordination between UGI’s Universal Service programs, particularly CAP and  
2       LIURP.
- 3       • Revise CAP agency contracts to include incentives for successfully achieving established  
4       goals for customer outreach, education, customer contact, and enrollment.
- 5       • Improve UGI call center staff education about universal service programs.
- 6       • Streamline the customer referral process for universal service programs by allowing  
7       direct processing of applications and/or direct transfer from UGI to the local agency  
8       handling the intake.
- 9       • Improve customer communications about all aspects of CAP.
- 10      • Increase LIURP funding by a percentage commensurate with the percent of any approved  
11      increase.
- 12      • Devote a full-time staff person with social work expertise to administer the CARES  
13      program.
- 14      • Ensure that customers who enter CARES are assisted with enrollment in all available  
15      universal service programs.
- 16      • Revise policies, practices, and procedures to proactively identify low income customers  
17      during all points of non-emergency customer contact.
- 18      • Revise security deposit policy to ensure that customers are informed that CAP eligibility  
19      prohibits the request of a security deposit and are screened for that eligibility before  
20      being asked to pay security deposit amount.
- 21      • Remove requirements for low income customers to enroll in a universal service program  
22      as a condition to receiving a security deposit waiver.

**CAUSE-PA Statement 1, Mitchell Miller**  
**PUBLIC VERSION**

- 1       • Revise security deposit policy to apply equally to both applicants and customers.
- 2       • Eliminate the restriction on medical certificate renewals for nonpayment of non-current
- 3       charges.
- 4       • Provide customers with a copy of UGI's medical certificate form upon request.
- 5       • Eliminate the requirement that the physician's office contact UGI directly to request a
- 6       medical certificate form.
- 7       • Revise medical certificate policy to accept any written document which contains the
- 8       required information.
- 9       • Revise medical certificate policy to eliminate inference that UGI's medical certificate
- 10      form is required.
- 11      • Exempt confirmed low income customers from the EE&C Rider, or designate EE&C
- 12      Rider funds collected from confirmed low income customers directly to LIURP.

13   **Q. Does this conclude your Direct Testimony?**

14   A. Yes.

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**EMPLOYMENT**

**2009-Present Mitch Miller Consulting LLC:**

Practice provides consulting services that promote the public interest with a focus on low income households. Specifically over 35 years of expertise is applied to the evaluation of regulatory policy involving customer service, complaint handling, credit and collections and universal service. Objective is to promote public policy development, program design, and implementation of programs for consumer education, energy efficiency, credit and collections, and customer assistance.

**2009-2012 Pennsylvania Department of Community and Economic Development  
Consultant**

Served as a Consultant on weatherization and energy efficiency for the Pennsylvania Weatherization Assistance Program (WAP) at PA DCED. Was instrumental in transforming the WAP program by creating a performance-based system, dedicated to a high standard of quality, compliance and production. Innovations include introducing performance standards for production, quality and compliance and independent certification and training for all state WAP workers. Also responsible for coordinating the states WAP program with the PUC, utilities and other efficiency programs.

**1992-2009 Pennsylvania Public Utility Commission, Bureau of Consumer Services  
Harrisburg, PA  
Director**

Until his retirement from state service Mr. Miller was director of Consumer Services and PA PUC. His bureau has regulatory authority and responsibility for policy development for all areas of consumer services including resolving consumer complaints and problems, enforcing consumer regulations, developing, implementing and evaluating programs involving complaint handling, complaint analysis collections, enforcement of consumer regulations, utility customer assistance programs and low income conservation. He also directed BCS responsibilities for implementing the Pennsylvania Electric, Gas and Telephone Customer Choice Programs. Specific areas under his Direction include:

**Program evaluation and regulation**

- Monitoring and evaluating the customer service practices and programs of utilities
- Promulgating regulations, implementing procedures to meet regulatory requirement and taking enforcement action to assure compliance

- Field reviews and audits of utilities' operations and advice the Commission regarding issues of interest and concern of utility consumers
- Compliance enforcement including informal investigations and prosecution of formal cases
- Track trends in the number and type of consumer complaints and inquiries, utility performance at handling customer complaints and payment arrangement requests. Other databases utilized to track utility termination activity, collection of delinquent accounts, compliance with customer service regulations and other areas critical to evaluating utility customer service performance.
- Produce utility performance and evaluative reports for the PUC, utilities and the public

### **Universal service programs**

- The LIURP is targeted toward low-income households with the highest energy consumption, payment problems, and high arrearages. Since the program's inception to 2009, the major electric and gas companies required to participate in LIURP have spent over \$530 million to provide weatherization treatments to more than 350,000 low-income households in Pennsylvania. The budgets for 2008 were 22 million for electric utilities and 9 million for gas utilities
- Customer Assistance Programs (CAPs) provide an alternative to traditional collection methods for low income, payment troubled utility customers. Customers make regular monthly payments, which may be for an amount that is less than the current bill for utility service. Budgets for CAP programs in 2008 were 189 million for electric companies and 174 million for gas companies. Utility companies have spent over 2 billion dollars for CAP through 1998.

### **Utility Complaint Handling and Regulation**

- Responsible for establishing procedures and directing 90 staff in investigating annually over 100,000 informal consumer complaints for regulated fixed utilities, payment arrangement requests and responding to over 70,000 inquiries.
- Arbitrate billing, credit and other informal complaints and issue binding decisions to resolve informal disputes expeditiously. Investigators also issue decisions regarding the amortization of overdue electric, gas, steam heat, water, wastewater and basic telephone bills.

### **1978-1992 Pennsylvania Public Utility Commission, Division of Research and Planning Harrisburg, PA Chief**

Reported to Director of Bureau of Consumer Services with direct responsibility for the direction, supervision and planning of a Division of 15 professionals who are delegated program responsibilities for regulation enforcement, utility program evaluation, customer assistance programs and consumer education. As the first Division Chief he was instrumental in creating these activities

- Bureau's compliance program in enforcing customer service regulations and statues through regulator interpretations, citations and litigation; including preparing with legal staff formal records, briefs, motions, interrogatories, reviewing utility responses and negotiating equitable settlements.

- Development and implementation of computer information evaluation systems for evaluation of utility customer service programs; systematic performance problems are identified through statistical analysis and observation and correction actions recommended via public reports, formal rate cases and consumer services audit programs.
- Managed the development of Commission's first consumer education program including proposing annual plans, statewide networking, supervising staff in conducting of workshops and conferences, and preparation of consumer education materials.
- Supervised the development of an integrated program for low income consumers; through program evaluation, leading to testimony, preparation of policy recommendations, interdepartmental coordination, regulation promulgation and establishing evaluation criteria

### **1977-1978 Pennsylvania Public Utility Commission**

**Harrisburg, PA**

**Research Analyst**

Responsible for evaluating existing utility and Commission customer service programs and identifying problems and recommendations for change, which led to Division's current programs.

### **1974-1977 Governor's Action Center**

**Harrisburg, PA**

**Research Supervisor**

Office supervisor for a research and information unit. Duties included the modification and maintenance of an information and evaluation system, writing technical and topical reports, quality control review and staff training. Responsible for the supervision of five case evaluator and student interns.

## **EDUCATION**

M.S., Shippensburg University, 1984

Major: Public Administration

G.P.A. 3.9/4.0

B.S., Pennsylvania State University, 1974

Major: Community Development

Cum Laude

## **Additional Affiliations**

Board of Directors, Keystone Energy Efficiency Alliance

Co-Chair Keystone Energy Efficiency Alliance Conference

Member, Pennsylvania WAP Policy Advisory Council

Past Co-Chair National Energy and Utility Affordability Conference

**Table of Contents: Interrogatory Responses of UGI**

<b>Response of UGI to CAUSE-PA I-4</b> .....	Appendix B, 2
<b>Response of UGI to CAUSE-PA I-5</b> .....	Appendix B, 3
<b>Response of UGI to CAUSE-PA I-6</b> .....	Appendix B, 4
<b>Response of UGI to CAUSE-PA I-7</b> .....	Appendix B, 5
<b>Response of UGI to CAUSE-PA I-8</b> .....	Appendix B, 6
<b>Response of UGI to CAUSE-PA I-11</b> .....	Appendix B, 7
<b>Response of UGI to CAUSE-PA I-14</b> .....	Appendix B, 8
<b>Response of UGI to CAUSE-PA I-16</b> .....	Appendix B, 9
<b>Response of UGI to CAUSE-PA I-17</b> .....	Appendix B, 10
<b>Response of UGI to CAUSE-PA I-18</b> .....	Appendix B, 11
<b>Response of UGI to CAUSE-PA I-19</b> .....	Appendix B, 12
<b>CONFIDENTIAL Response of UGI to CAUSE-PA II-3</b> .....	Appendix B, 13
<b>Response of UGI to CAUSE-PA II-4</b> .....	Appendix B, 14
<b>Response of UGI to CAUSE-PA II-8</b> .....	Appendix B, 15
<b>Response of UGI to CAUSE-PA II-11</b> .....	Appendix B, 16
<b>Response of UGI to CAUSE-PA II-12</b> .....	Appendix B, 17
<b>Response of UGI to CAUSE-PA II-25</b> .....	Appendix B, 18
<b>Response of UGI to CAUSE-PA III-5</b> .....	Appendix B, 19
<b>Response of UGI to CAUSE-PA III-11</b> .....	Appendix B, 20
<b>Response of UGI to CAUSE-PA IV-2</b> .....	Appendix B, 22
<b>Response of UGI to CAUSE-PA V-12</b> .....	Appendix B, 23
<b>Response of UGI to Office of Consumer Advocate (OCA) III-4</b> .....	Appendix B, 24

**Response of UGI to CAUSE-PA I-4**

**Question 4** (Prepared by Robert Stoyko)

As of the date of this response, how many confirmed low-income customers reside within UGI's service territory, disaggregated by percentage of federal poverty level (0-50%, 51-100%, 101-150% of the Federal Poverty Level)? Please also explain how UGI confirms a customer as low income.

*Response:*

Please see Attachment CAUSE-PA I-4.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA 1-4.pdf</a>	

<b>Percent of Federal Poverty</b>	<b># of customers*</b>
0%-50%	5,178
51%-100%	9,531
101%-150%	7,563
151% -200%	4,083
Unknown Income	8,745
<b>Total</b>	<b>35,100</b>

\*As of March 1, 2016

UGI customers are classified as confirmed "low income" if they:

- participate in CAP (agency verifies income)
- receive LIHEAP, CRISIS, Operation Share, or other assistance (agency verifies income)
- were weatherized within the last twelve months (agency verifies income)
- self-reported income of level 1 or 2

### Response of UGI to CAUSE-PA I-5

**Question 5** (Prepared by Robert Stoyko)

As of the date of this response, how many estimated low income customers reside within Columbia's service territory? Please disaggregate by income (50%, 100%, and 150% of federal poverty level (FPL)) and explain how UGI arrived at its estimated figures. Include a copy of any and all workpapers, reports or studies used to perform the estimation.

*Response:*

CAUSE-PA verified that this request is for UGI Gas Service. UGI's estimated low income customer count is based on census data. The Pennsylvania Bureau of Consumer Services provided an updated census file on June 4th, 2014. UGI used this data when we submitted our 2014-2017 USCEP. UGI is not able to disaggregate this data by income. Refer to Attachment CAUSE-PA-I-5.

Attachment File Name	Attachment Note
<a href="#">CAUSE Set I-5.pdf</a>	

Poverty Levels for Pennsylvania Counties (Low Income - < 150 and Higher Income 150 >): 2010-2012.  
 Poverty Levels Shown for Households, Families and Individuals.  
 Source: 2010-2012 American Community Survey 3-Year Estimates - United States Census Bureau  
 File Received 6-4-2014; S. Dewey Email

Attachment Cause-PA I-5  
 R. R. Stoyko  
 Page 1 of 1

**PUC Provided Census Data**

County	Total N	N *	% *	UGI-Gas	UGI-Gas 150%
Adams	37919	8501	22.42%		
Allegheny	522238	133670	25.60%		-
Armstrong	28735	8376	29.15%		-
Beaver	70787	19128	27.02%		-
Bedford	20570	6608	32.12%		-
Berks	154092	43374	28.15%	65,638	18,476
Blair	50990	16134	31.64%		
Bradford	24103	7921	32.86%		-
Bucks	230384	31980	13.88%	6,862	953
Butler	73147	15473	21.15%		
Cambria	58197	18052	31.02%		-
Carbon	25919	6965	26.87%	32	9
Centre	57266	19759	34.50%		-
Chester	184364	28115	15.25%	18	3
Clarion	16027	5869	36.62%		-
Clearfield	32158	10466	32.55%		-
Clinton	15287	5033	32.92%		-
Columbia	26188	8650	33.03%		-
Crawford	35042	12165	34.72%		-
Cumberland	95126	17309	18.20%	34,037	6,193
Dauphin	107891	29307	27.16%	45,525	12,366
Delaware	205185	45158	22.01%		-
Elk	13596	2824	20.77%		-
Erie	109522	35654	32.55%		-
Fayette	54372	20392	37.50%		-
Franklin	57739	15053	26.07%		-
Greene	14222	4366	30.70%		-
Huntingdon	16992	4933	29.03%		-
Indiana	34652	12699	36.65%		-
Jefferson	18637	6469	34.71%		-
Juniata	9321	3051	32.73%		-
Lackawanna	85721	25379	29.61%		-
Lancaster	193931	49905	25.73%	63,266	16,280
Lawrence	36752	11698	31.83%		-
Lebanon	51807	12881	24.86%	16,863	4,193
Lehigh	133322	38978	29.24%	46,540	13,606
Luzerne	130097	41496	31.90%	7,524	2,400
Lycoming	45933	14484	31.53%		-
McKean	17373	5967	34.35%		-
Mercer	46345	14969	32.30%		-
Mifflin	18947	7373	38.91%		-
Monroe	58173	15786	27.14%	143	39
Montgomery	307618	46236	15.03%	2,464	370
Northampton	112120	23948	21.36%	44,980	9,607
Northumberland	39109	12149	31.06%		-
Perry	18231	4265	23.39%		-
Philadelphia	576889	262214	45.45%		-
Pike	21759	4748	21.82%		-
Schuylkill	59689	17548	29.40%	22	6
Snyder	14481	4587	31.68%		-
Somerset	29626	9077	30.64%		-
Susquehanna	17001	5012	29.48%		-
Tioga	17039	5644	33.12%		-
Union	15295	4346	28.41%		-
Venango	22956	7761	33.81%		-
Warren	17046	5169	30.32%		-
Washington	83920	19617	23.38%		-
Wayne	19521	6040	30.94%		-
Westmoreland	152022	38247	25.16%		-
Wyoming	10852	2995	27.60%		-
York	168566	38362	22.76%	1,351	307
Total (for 61 counties)	4922809	1360335	27.63%	335,265	84,809.63
Total (for 67 counties) **	4949625	1368512	27.65%		

**Response of UGI to CAUSE-PA I-6**

**Question 6** (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's confirmed low-income customers were/are enrolled in CAP, disaggregated by income level (0-50%, 51-100%, 101-150% FPL)?

*Response:*

Please see Attachment CAUSE-PA I-6.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA I-6.pdf</a>	

<b>Percent of Federal Poverty</b>	<b>CAP Participants*</b>
0%-50%	2,463
51%-100%	3,808
101%-150%	1,695

\*As of 3/2/16

### Response of UGI to CAUSE-PA I-7

**Question 7** (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's confirmed low-income customers received a LIHEAP Cash Grant and/or Crisis Grant in the 2015-2016 LIHEAP program year? Please disaggregate by the type of grant received (Cash only, Crisis only, or both Cash and Crisis) and income level (0-50%, 51-100%, 101-150% FPL).

*Response:*

Please see Attachment CAUSE-PA I-7.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA I-7.pdf</a>	

<b>Percent of Federal Poverty</b>	<b># of customers*</b>	<b>Cash Only</b>	<b>Crisis Only</b>	<b>Both</b>
0%-50%	448	390	56	2
51%-100%	712	642	65	5
101%-150%	350	325	23	2
Unknown Income	6,159	5,262	37	860

\*As of March 1, 2016

## **Response of UGI to CAUSE-PA I-8**

**Question 8** (Prepared by Robert Stoyko)

As of the date of this response, how many of UGI's customers were enrolled in CAP, but did not receive a LIHEAP Grant in the 2015-2016 LIHEAP program year?

*Response:*

Of 7,966 CAP participants, 5,497 have not received a LIHEAP grant that was applied to their UGI account. An unknown number of participants may have received LIHEAP for another provider.

No Digital Attachments Found.

**Response of UGI to CAUSE-PA I-11**

**Question 11** (Prepared by Robert Stoyko)

What efforts, if any, does UGI make to enroll non-CAP customers in CAP who have applied for and received LIHEAP? Please include any documents used in CAP outreach efforts, including copies of letters to customers, phone scripts, marketing materials, and other supporting documentation.

*Response:*

UGI completes an annual cross referral process. LIHEAP recipients are reviewed and if eligible, a CAP application is mailed. Additionally, when calling UGI, LIHEAP recipients are referred to CAP by UGI's Customer Care Team. Calls related to past due balances or termination notices are also screened for CAP eligibility.

Contracted Community Based Organizations receive information regarding CAP solicits when appropriate. Please see Attachments CAUSE-PA I-11-1, 11-2, and 11-4, which are examples of the types of outreach materials used to expand CAP participation.

The UGI website contains information on the Customer Assistance Programs. Please see Attachment CAUSE-PA I-11-3.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA I - 11-3.pdf</a>	
<a href="#">CAUSE-PA Set I - 11-1.pdf</a>	
<a href="#">CAUSE-PA Set I - 11-2.pdf</a>	
<a href="#">CAUSE-PA Set I - 11-4.pdf</a>	

**LIHEAP Recipient**

March 2, 2016

CUSTOMER  
MAILING ADDRESS  
CITY/ST/ZIP

ACCOUNT NO.  
SERVICE ADDRESS  
CITY/ST/ZIP

Dear Customer,

Thank you for your recent request to participate in UGI's Customer Assistance Program (CAP). This program may provide your household with an affordable, monthly payment calculated on a percent of income, average bill, or minimum allowable amount.

Please review the "CAP Income Guidelines" below to determine if you are eligible for the program.

<b>Household Size</b>	<b>Monthly Income</b>
<b>1</b>	\$1,485
<b>2</b>	\$2,003
<b>3</b>	\$2,520
<b>4</b>	\$3,038
<b>5</b>	\$3,555
<b>6</b>	\$4,073
<b>7+ (Add)</b>	\$520

If you meet these guidelines and are interested in applying for CAP, please complete the enclosed application and return the application to: **AGENCY NAME, ADDRESS, CITY/ST/ZIP**. You will be contacted by a CAP caseworker once your application has been reviewed. Applications are reviewed in the order in which they are received.

If you have any questions about CAP, please call our office at 1-800-276-2722.

Sincerely,

UGI Customer Outreach Department

*Used for LIHEAP recipients*



March 2, 2016

CUSTOMER  
MAILING ADDRESS  
CITY/ST/ZIP

ACCOUNT NO.  
SERVICE ADDRESS  
CITY/ST/ZIP

Dear Customer,

Thank you for your recent request to participate in UGI's Customer Assistance Program (CAP). This program may provide your household with an affordable, monthly payment calculated on a percent of income, average bill, or minimum allowable amount.

Please review the "CAP Income Guidelines" below to determine if you are eligible for the program.

Household Size	Monthly Income
1	\$1,485
2	\$2,003
3	\$2,520
4	\$3,038
5	\$3,555
6	\$4,073
7+ (Add)	\$520

If you meet these guidelines and are interested in applying for CAP, please return the completed application, proof of income, and a copy of valid identification to: **AGENCY, ADDRESS, CITY/ST/ZIP**. You will be contacted by a CAP caseworker once your application has been reviewed. Applications are reviewed in the order in which they are received.

If you have any questions about CAP, please call our office at 1-800-276-2722.

Sincerely,

UGI Customer Outreach Department

*Used for non LIHEAP recipients*

# Gasline

FEBRUARY 2016

## February Featured Community Organization: American Heart Association

February's Featured Community Organization is the American Heart Association (AHA) in honor of American Heart Month.

With a mission "to build healthier lives, free of cardiovascular diseases and stroke," The American Heart Association helps inform people how making better lifestyle choices can help prevent heart disease, the leading cause of death for both men and women in America. AHA has over 22.5 million volunteers and supporters.



One of AHA's most impactful campaigns takes place on the first Friday in February each year: National Wear Red Day invites everyone to wear red in an effort to raise awareness and provide information about the risks of heart disease and stroke in women.

For more information, please visit UGI's blog, "UGI Connection" at <http://blog.ugi.com>, and the UGI website, [www.ugi.com/featuredorganization](http://www.ugi.com/featuredorganization), during February.

Get more energy tips and news from UGI via your favorite social media sites:

 [facebook.com/ugiuutilities](https://facebook.com/ugiuutilities)

 [twitter.com/ugi\\_utilities](https://twitter.com/ugi_utilities)

 @UGIReads

 [youtube.com/ugiuutilities](https://youtube.com/ugiuutilities)

 [blog.ugi.com](http://blog.ugi.com)

 @UGIUtilities

 [www.ugi.com/linkedin](http://www.ugi.com/linkedin)

 [www.ugi.com/email](mailto:www.ugi.com/email)



## Convenient Options for Paying Your UGI Gas Bill

At UGI, we understand our customers want to be able to view and pay their energy bill with ease. That is why we offer our customers a variety of payment options.

- **eBill:** Our online billing option allows you to view, download and print your bill at your own convenience for free. You can receive an email notification when your bill is ready to be viewed, view previous bills from up to 2 years, and print or view your bill 24/7. Once enrolled, you will no longer receive a paper bill, no longer need to write checks or pay stamps, and your payments will post in less time.
- **Budget Billing:** UGI estimates a customer's annual usage and spreads the amount evenly over the Budget Billing Plan period to calculate the monthly bill amount. The monthly Budget Billing payment may be adjusted every three months to keep the payment in line with the actual energy usage. This is a great plan for anyone whose gas or electric usage varies widely from month to month or is seasonal.
- **Automatic Deduction (ABC):** This plan allows you to have your UGI bill amount automatically transferred from your Checking or Savings account each month. Your bank will transfer the exact amount of your UGI bill on the due date of the bill each month so you will never have any late charges, and you can see how much was deducted on your monthly UGI statement as a record of your payment.
- **Customer Assistance:** Programs are available to assist any eligible customers in paying their utility bills. These programs include the Customer Assistance Program (CAP), Low Income Usage Reduction Program (LIURP), Operation Share, Customer Assistance and Referral Evaluation Services (CARES), and Low-Income Home Energy Assistance Program (LIHEAP). You can find all the programs you are eligible by entering the number of people that live in your house or apartment and the total annual income for each person at <http://www.ugi.com/customerassistance>.

### For customers who like to pay in more traditional ways may:

- Call UGI by telephone (need account number): (877) 503-2956
- Use third party site to pay in person:  
<https://www.checkfreepay.com/info/payinperson>
- Mail bill payment to:  
**UGI Utilities, Inc.**  
P.O. Box 15523  
Wilmington, DE 19886-5523

For more information on how to pay your bill, please visit:  
<http://www.ugi.com/billpay>





## UGI, Firefighters, Join Red Cross in MLK Day Fire Prevention Outreach

To commemorate and celebrate the service ideals of Martin Luther King, Jr., UGI observed the national holiday named in his honor by partnering with the American Red Cross on a critical, life-saving program. On Monday, January 18th, 35 employees based in UGI offices located in Berks and Luzerne Counties volunteered to join the American Red Cross and local firefighters to install smoke detectors and assist families in developing emergency exit plans in homes located in Reading and Wilkes-Barre. The event was part of the American Red Cross Home Fire Preparedness Campaign, which aims to reduce deaths and injuries caused by home fires by 25% nationally by 2020. In 2015, UGI committed \$100,000 in funding to support this program in communities located across the Company's service territory.

On Martin Luther King Day, teams of volunteers visited residences in neighborhoods with a heightened risk of home fires and installed smoke detectors or replaced batteries as needed. In addition, residents were provided with home fire prevention tips and provided with assistance in creating escape plans in the event a fire occurred within their home.

The Martin Luther King Day event is the latest in a series of UGI collaborative efforts with the American Red Cross in promoting the Fire Prevention Program. UGI is pleased and honored to work side-by-side with the American Red Cross to save lives in our communities.

### UGI Urges Residents to Remain Vigilant Regarding Carbon Monoxide

As colder weather blankets the region and residents turn up their thermostats, UGI urges customers to be aware of the dangers of carbon monoxide (CO) and to take steps to avoid a build-up of CO inside their homes and work spaces.

#### UGI recommends residents follow these basic steps:

- Ensure that natural gas appliances are properly maintained. A malfunctioning furnace, boiler, water heater or stove can emit CO into a home. In addition, restricted or damaged ventilation or exhaust equipment, including a blocked chimney, can produce high levels of CO.
- Make sure smoke and carbon monoxide detectors are installed inside the home or workspace, are working properly, and have fresh batteries. CO detectors/alarms should be located on each floor of a home, especially near every separate sleeping area.
- Check to make sure that both internal and external vents are free from obstructions such as clothing and furniture inside; and dirt, snow or ice outside.

- Ensure that equipment rooms or utility spaces are properly sized and provide appropriate levels of ventilation and air circulation around heating equipment and appliances to ensure safe operation.

UGI also urges residents to be aware of the signs of CO in their homes. Carbon monoxide is a colorless, odorless, poisonous gas that is a by-product of the improper combustion of fuels such as wood, charcoal, gasoline, kerosene, oil, natural gas and propane. Symptoms of CO poisoning include headache, fatigue, shortness of breath, nausea and dizziness. Physical signs within a home that an appliance may be malfunctioning and producing CO include condensation on walls and windows, house plants dying, house pets becoming sluggish, chronic odors from a malfunctioning appliance and residents in the home suffering flu-like symptoms or feeling unusually tired.

**CO poisoning can be fatal.** Individuals who think they might be experiencing symptoms of CO poisoning should immediately seek fresh air and prompt medical attention.

### We Are Here to Help!

Please call **1-800-276-2722 for emergencies** and select option 1 (available 24/7).

*Para informar de un escape de gas u olor, por favor llame al 1-800-276-2722 y seleccione la opción 1 (disponibles 24/7).*

For non-emergency requests, you may call 1-800-276-2722 weekdays from 8 a.m. to 5 p.m.

To pay your bill online and learn more about natural gas, please visit: [www.ugi.com](http://www.ugi.com).

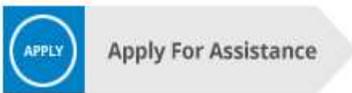


**Energy to do more®**



### CAP Customer Assistance Program

UGI's **Customer Assistance Program (CAP)** offers qualified, income-eligible customers a more manageable monthly energy bill. UGI provides CAP participants with a personalized, monthly payment amount based on gross income, household size and energy usage at the property. In most cases this program makes UGI bills more affordable. Over time, following consistent program payments, participants' past debt to UGI can be forgiven. When CAP bills are paid on or before due date, the difference between the amount billed and the actual amount used may be forgiven. UGI partners with several agencies to provide this useful program to its customers.



Apply For Assistance

## Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP (Low Income Home Energy Assistance Program) is a federally funded program administered by each state that helps low income households pay their heating bills through energy assistance grants. Generally, the LIHEAP program begins in the fall. There are two components to the LIHEAP program: CASH and CRISIS. If eligible, a customer must apply every year for this assistance.

**CASH COMPONENT:** To be eligible for a cash grant, a customer must be responsible for home heating costs. CASH grants are payments that are applied directly to your UGI account. This is not a loan and the money does not have to be paid back.

**CRISIS COMPONENT:** Additional money is available through a crisis grant. CRISIS grants help families who are in danger of being without heat.

*Situations include:*

- Having utility services shut-off
- Active termination notice
- Broken heating equipment
- Leaking fuel lines

Homeowners or renters whose gross annual income meets the income guidelines established for the program by the State are eligible.

To apply, a customer must have the names, Social Security numbers, proof of income for all household members and a recent heating bill.

For more information regarding this program, customers can contact UGI or their local County Assistance Office.



## C.A.R.E.S. Program

CUSTOMER ASSISTANCE REFERRALS EVALUATION SERVICES (C.A.R.E.S.)

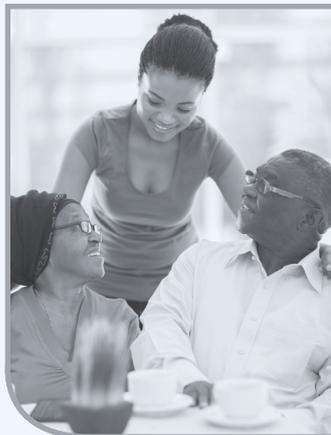
C.A.R.E.S. is a program that can provide referrals to other helpful programs in your community. UGI will send any customer regardless of income a Customer Assistance Guide and energy related information specifically for their area. These programs can include the Low Income Home Energy Assistance Program (LIHEAP), budget counseling, state Weatherization or Office of Aging programs.

### ELIGIBILITY CRITERIA

- Residential customer
- Customers experiencing a temporary personal or financial crisis

### Additional Services offered by UGI:

- Conservation Literature
- Gift Credits
- Third Party Notification
- Extended Due Date
- Online Bill Pay
- Budget Billing
- Payment Arrangements



## Universal Service Programs

For more information please call:  
**1-800-UGI-WARM**  
**1-800-844-9276**



1-800-UGI-WARM (1-800-844-9276)

## Customer Assistance Program (CAP)

UGI's Customer Assistance Program (CAP) offers qualified, low income customers a more manageable monthly energy bill. UGI provides CAP participants with a personalized, monthly payment amount based on gross income, household size and energy usage at the property. In most cases this program makes UGI bills more affordable. Over time, following consistent program payments, participants' past debt to UGI can be forgiven. UGI partners with several agencies to provide this useful program to its customers.

### ELIGIBILITY CRITERIA

- Customer must have an active residential account
- The property must be the customer's only residence
- Gross Annual Income must be at or below 150% of the Federal Poverty Level:

Household Size	150% FPL Household Income
1 .....	\$17,655
2 .....	\$23,895
3 .....	\$30,135
4 .....	\$36,375
5 .....	\$42,615
6 .....	\$48,855
7 .....	\$55,095
<b>For each addition person add:</b> .....	<b>\$6,240</b>



## Low Income Usage Reduction Program

UGI's LIURP offers free weatherization measures to low-income residential heating customers in order to limit heat loss and provide long-term energy savings. These energy savings measures may include window and baseboard caulking, door and window weather-stripping, attic and sidewall insulation, duct and pipe insulation, ventilation, water conservation devices, furnace inspection and energy education.

In addition, non-heating UGI Electric accounts may qualify for measures such as refrigerator replacement and high efficiency lighting.

### ELIGIBILITY CRITERIA

- An active UGI gas or electric heating account with twelve (12) or more continuous billing periods for the same account number
- Higher than average gas or electric heating usage during the twelve month period to meet specified consumption levels for the program
- Renters can qualify with written permission from landlords
- Gross Annual Income at or below 150% of Federal Poverty Level  
*(See CAP Income Guidelines)*
- A percentage of customers who may have extenuating circumstances can be accepted at 200% of Federal Poverty Level  
*(See Operation Share Income Guidelines)*



## Operation Share

The Operation Share program provides energy assistance grants to qualified customers who experience difficulty paying their heating bills. This community-based program is funded by voluntary donations from UGI employees, UGI customers and concerned citizens. In addition, UGI provides a corporate donation to help fund the program.

### ELIGIBILITY CRITERIA

- The customer must have an active UGI account
- The customer's gross income must be at or below 200% of Federal Poverty Level
- This grant may be received one time per twelve (12) month period

Household Size	200% FPL Household Income
1 .....	\$23,540
2 .....	\$31,860
3 .....	\$40,180
4 .....	\$48,500
5 .....	\$56,820
6 .....	\$65,140
7 .....	\$73,460
<b>For each addition person add:</b> .....	<b>\$8,320</b>

**Response of UGI to CAUSE-PA I-14**

**Question 14** (Prepared by Robert Stoyko)

Please provide a copy of the reports or, if not in report form, the data, submitted to the PUC Bureau of Consumer Services in compliance with Universal Services reporting requirements of 52 Pa Code § 62.5 for the last three years.

*Response:*

Please see Attachments CAUSE-PA-I-14-1, 14-2, and 14-3.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA I-14-1.pdf</a>	
<a href="#">CAUSE-PA I-14-2.pdf</a>	
<a href="#">CAUSE-PA I-14-3.pdf</a>	

<b>UGI GAS Collection</b>	<b>2014 All Residential</b>	<b>2014 Confirmed Low Income</b>
1. Total Number(#) - Payment Arrangements	35,080	29,896
2. Total Number(#) - Successful Payment Arrangements	12,611	9,321
<b>(#2 must be less than #1)</b>		
3. Annual Collection Operating Expenses (\$)	\$2,568,308	\$1,279,017
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$7,052,238	\$4,607,873
5. Total Dollar Amount(\$) Net Residential Write-offs	\$5,998,569	\$3,622,816
6. Total Number(#) Residential Customers - By Month:		
January	330,143	39,607
February	331,118	40,633
March	332,265	41,837
April	331,971	41,677
May	330,888	41,841
June	330,638	41,946
July	329,893	41,623
August	329,845	41,232
September	330,023	41,305
October	331,700	42,147
November	334,709	42,835
December	335,801	42,979
	<b>3,978,994</b>	<b>499,662</b>
	<b>331,583</b>	<b>41,639</b>
7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,365	1,731
February	4,016	3,082
March	5883	4,903
April	7837	6546
May	9003	7472
June	9512	8051
July	7951	7043
August	7217	6395
September	6758	6012
October	4759	4389
November	3814	3556
December	3122	1847
	<b>72,237</b>	<b>61,027</b>
	<b>6,020</b>	<b>5,086</b>
7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	29,487	13,172
February	27,293	12,387
March	29551	12,719
April	28089	11,336
May	29540	11,332
June	28702	10,820
July	27006	10764
August	25549	10,112
September	24192	9,396
October	21490	10,182
November	23664	10,297
December	25883	12,070
	<b>320,446</b>	<b>134,587</b>
	<b>26,704</b>	<b>11,216</b>

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$849,270	645,085
February	\$1,811,927	1,415,088
March	\$3,067,538	\$2,654,548
April	\$4,756,768	\$4,077,646
May	\$4,999,739	\$4,298,559
June	\$4,679,106	\$4,112,544
July	\$3,463,618	\$3,163,596
August	\$2,831,486	\$2,579,281
September	\$2,322,516	\$2,130,609
October	\$1,507,310	\$1,423,619
November	\$1,180,062	\$1,117,205
December	\$722,126	\$639,617
<b>(Sum of #8a must be less than sum of #12b)</b>	<b>\$ 32,191,466</b>	<b>\$ 28,257,396</b>
	<b>\$ 2,682,622</b>	<b>\$ 2,354,783</b>
8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	8,419,352	5,034,696
February	9,992,520	6,018,733
March	\$12,220,643	\$7,055,596
April	\$11,111,582	\$5,881,216
May	\$9,902,479	\$5,180,165
June	\$7,789,365	\$4,220,951
July	\$6,547,879	\$3,785,145
August	\$5,363,638	\$3,154,033
September	\$4,029,708	\$2,411,057
October	\$3,895,300	\$2,497,233
November	\$3,954,200	\$2,600,843
December	\$5,697,936	\$3,786,536
<b>(sum of #8b must be less than 12b)</b>	<b>\$ 88,924,601</b>	<b>\$51,626,203</b>
	<b>\$ 7,410,383</b>	<b>\$4,302,184</b>
9. Total Number(#) Residential Payment Troubled Customers - By Month:		
January	10319	9192
February	10578	9417
March	11208	9921
April	11407	9927
May	12244	10515
June	12690	10958
July	13022	11231
August	12560	10862
September	12047	10513
October	11855	10395
November	11541	10215
December	11373	10073
<b>(#9 must be less than #6)</b>	<b>140,844</b>	<b>123,219</b>
	<b>11,737</b>	<b>10,268</b>

10. Total Number(#) Terminations - By Month:		
January	0	0
February	0	0
March	0	0
April	1,845	1,370
May	1,800	1,225
June	1,953	1,335
July	1,664	1,284
August	1,465	1,109
September	1,761	1,216
October	595	433
November	66	46
December	0	0
<b>(Must be less than #6 each month)</b>	<b>11,149</b>	<b>8,018</b>
	<b>929</b>	<b>668</b>

11. Total Number(#) Reconnections - By Month:		
January	18	5
February	9	3
March	4	1
April	389	277
May	597	375
June	629	401
July	584	364
August	602	394
September	987	614
October	768	443
November	523	299
December	130	66
<b>(must be less than #6 in each month)</b>	<b>5,240</b>	<b>3,242</b>
	<b>437</b>	<b>270</b>

12. Total Number(#) Low Income Households (Accounts) (Estimated)	84,809
<b>(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document</b>	

12B. Annual Residential Revenues (\$)	\$ 231,393,035	\$ 35,997,461
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#### Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - LIURP	2014
13. Program Costs (\$)/Actual Spending for the Year Just Completed	529,676
14. Number of Family Members Under Age 18	1.57
15. Number of Family Members Over Age 62	0.32
16. Family Size	3.6
17. Income (\$)	19,734

18. Source of Income	
Employment	33
Public Assistance	8
Pension/Retirement	18
Unemployment Compensation	2
Disability	18
Other (includes Missing Data)	9

19. Participation Levels By Month (#) - Reporting Year:	
Heating Jobs:	
January	2
February	3
March	12
April	11
May	9
June	6
July	3
August	6
September	11
October	6
November	5
December	14

*total* 88

Water Heating Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

Baseload Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

20. Projected Spending for the Current Year - (\$)	796,100
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21. Projected Annual Production Number (#) - Current Year	
Heating Jobs	114
Water Heating Jobs	0
Baseload Jobs	0

22. Average Job Costs (\$)	
Heating Jobs	4,919
Water Heating Jobs	0
Baseload Jobs	0

22.A. Source of Intake: (gas industry only)	
Distribution Company	0
Community-Based Organization	88
Other	0

22.B. Participants in Multiple Programs: (gas industry only)	
LIURP and CAP	59
LIURP and CARES	0
LIURP and Hardship Fund	13
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	9
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

### Universal Service Reporting Requirements - Input Document

Program Reporting	
<b>UGI GAS - CAP</b>	<b>2014</b>
23. Program Costs - Administration (\$)	\$262,306
24. Program Costs - CAP Credits (\$)	\$1,542,948
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$677,204
Program Costs - CAP Accounts in Arrears - (\$):	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
Program Costs - CAP Accounts in Arrears - (#):	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.5
29. Number of Family Members Over Age 62	0.17
30. Family Size	3.0
31. Income (\$)	\$ 13,475

32. Source of Income	
Employment	2,809
Public Assistance	1,074
Pension/Retirement	401
Unemployment Compensation	347
Disability	1,691
Other (includes Missing Data)	715
	7,037

33. Participation Levels By Month - Income at or below 50% of Poverty (#):	
January	2,041
February	2,151
March	2,235
April	2,311
May	2,435
June	2,528
July	2,531
August	2,519
September	2,514
October	2,501
November	2,460
December	2,431
	2,388

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	2,311
February	2,547
March	2,783
April	3,008
May	3,328
June	3,526
July	3,605
August	3,631
September	3,690
October	3,690
November	3,669
December	3,674
	3,289
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	449
February	549
March	678
April	810
May	1,020
June	1,131
July	1,191
August	1,237
September	1,278
October	1,325
November	1,356
December	1,364
	1,032
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	241
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	350
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	124
39. Participation Level: Exists other than Defaults (#)	1,166
40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,444,504
41. Energy Assistance Benefits (number of cutomers)(#)	4,640
42. Number of Full CAP Payments by Month:	
January	2,400
February	2,706
March	2,995
April	3,958
May	4,046
June	3,830
July	4,373
August	4,469
September	4,764
October	5,376
November	4,661
December	3,951
	47,529
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 5,757,623

<b>44. Total Number of CAP Bills Rendered by Month (#):</b>	
January	4616
February	4490
March	5283
April	5684
May	6101
June	6646
July	7220
August	7155
September	7056
October	7593
November	6279
December	7426
	75549
<b>45. Total Cash Payments by CAP Customers (\$)</b>	<b>\$ 4,348,982</b>
<b>46. Number of Full, On-Time Payments (#):</b>	<b>22,622</b>

<b>46.A. Source of Intake: (gas industry only)</b>	
Distribution Company	1,828
Community-Based Organization	3,039
Other	0

<b>46.B. Participants in Multiple Programs: (gas industry only)</b>	
CAP and LIURP	59
CAP and CARES	3
CAP and Hardship Fund	173
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	9
CAP, CARES and Hardship Fund	2
CAP, LIURP, CARES and Hardship Fund	0

**Universal Service Reporting Requirements - Input Document**

<b>UGI GAS - CARES</b>	<b>2014</b>
47. Program Costs (\$)	\$ 70,002
48. Number of Family Members Under Age 18	1.00
49. Number of Family Members Over Age 62	0.27
50. Family Size	2.83
51. Income (\$)	\$ 17,313

<b>52. Source of Income:</b>	
Employment	12
Public Assistance	3
Pension/Retirement	3
Unemployment Compensation	0
Disability	5
Other (includes Missing Data)	9
	32

<b>53. Participation Levels By Month:</b>	
January	2
February	0
March	1
April	1
May	2
June	0
July	0
August	1
September	3
October	3
November	16
December	3

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$ 2,232
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	10
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$ 5,500
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	11
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$ 2,452,331
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	13,245
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$ 1,094,276
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	3,635
62. Direct Dollars Applied to CARES Accounts (dollars)(\$)	\$ 4,757
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	15
64. CARES Benefits (#) - Number of Customers Referred to CARES	32
65. CARES Benefits (#) - Number of Customers Accepted into CARES	32

65.A. Source of Intake: (gas industry only)	
Distribution Company	32
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	0
CARES and CAP	3
CARES and Hardship Fund	13
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	2
Cares, LIURP, CAP and Hardship Fund	0

#### Universal Service Reporting Requirements - Input Document

UGI GAS - Hardship Fund	2014
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$0
b. Administrative Costs from Shareholders (\$)	\$6,520
67. Number of Family Members Under Age 18	1.49
68. Number of Family Members Over Age 62	0.13
69. Family Size	3.2
70. Income (\$)	\$19,052.04

71. Source of Income:	
Employment	371
Public Assistance	15
Pension/Retirement	31
Unemployment Compensation	36
Disability	144
Other (includes Missing Data)	55

<b>72. Participation Levels By Month (#):</b>	
Nov	52
Dec	35
Jan	33
feb	32
Mar	10
Apr	6
May	44
June	86
July	25
Aug	29
Sept	204
Oct	96
<b>total</b>	<b>652</b>
<b>73. Ratepayer/Employee Contributions (\$)</b>	<b>\$82,934</b>
<b>74. Special Contributions (\$):</b>	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0
<b>75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)</b>	<b>\$ 40,000.00</b>
<b>76. Utility Contributions (\$) - (excluding #66 and #75)</b>	<b>\$16,000</b>
<b>77. Utility Contributions (\$) - (dependent upon a match from customer contributions)</b>	<b>\$ 16,000.00</b>
<b>78. Outreach Contacts (Name of Agency, Address and Telephone # by County )</b>	
(This is a separate list)	
<b>Hardship Fund Benefits:</b>	
<b>79. Cash Benefits (number of grants)(#)</b>	<b>652</b>
<b>80. Cash Benefits (dollars in grants)(\$)</b>	<b>\$146,199.85</b>
<b>80.A. Source of Intake: (gas industry only)</b>	
Distribution Company	0
Community-Based Organization	652
Other	0
<b>80.B. Participants in Multiple Programs: (gas industry only)</b>	
Hardship Fund and LIURP	13
Hardship Fund and CAP	173
Hardship Fund and CARES	13
Hardship Fund, LIURP and CAP	9
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	2
Hardship Fund, LIURP, CAP and CARES	0

<b>UGI GAS Collection</b>	<b>2013 All Residential</b>	<b>2013 Confirmed Low Income</b>
1. Total Number(#) - Payment Arrangements	29,063	24,416
2. Total Number(#) - Successful Payment Arrangements	13,739	10,313
<b>(#2 must be less than #1)</b>		
3. Annual Collection Operating Expenses (\$)	\$2,264,783	\$1,902,418
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$4,756,334	\$3,685,628
5. Total Dollar Amount(\$) Net Residential Write-offs	\$3,816,148	\$3,168,542
6. Total Number(#) Residential Customers - By Month:		
January	322,532	39,178
February	323,755	40,295
March	324,571	41,119
April	324,635	40,768
May	323,648	40,797
June	323,839	40,546
July	323,287	39,973
August	323,152	38,527
September	323,409	38,056
October	325,130	38,280
November	328,008	38,550
December	328,946	38,760
	<b>3,894,912</b>	<b>474,849</b>
	<b>324,576</b>	<b>39,571</b>
7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,242	1,461
February	3,001	2,247
March	5342	4,554
April	7071	5996
May	7564	6411
June	7337	6453
July	6684	5977
August	6139	5461
September	5150	4723
October	3964	3664
November	2842	2618
December	1743	1493
	<b>59,079</b>	<b>51,058</b>
	<b>4,923</b>	<b>4,255</b>
7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	23,296	11,203
February	22,074	11,032
March	21834	9,730
April	22778	9,407
May	25233	10,401
June	25790	10,668
July	24910	10504
August	23790	10,039
September	25516	10,055
October	25557	10,029
November	26510	10,665
December	28045	12,177
	<b>295,333</b>	<b>125,910</b>
	<b>24,611</b>	<b>10,493</b>

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$659,251	457,664
February	\$1,101,076	867,249
March	\$2,512,007	\$2,208,152
April	\$3,486,414	\$3,072,151
May	\$3,464,020	\$3,064,510
June	\$3,035,287	\$2,773,330
July	\$2,467,700	\$2,288,401
August	\$2,010,346	\$1,841,099
September	\$1,532,906	\$1,445,648
October	\$1,103,136	\$1,041,044
November	\$741,654	\$701,377
December	\$510,416	\$457,115
<b>(Sum of #8a must be less than sum of #12b)</b>	<b>\$ 22,624,212</b>	<b>\$ 20,217,740</b>
	<b>\$ 1,885,351</b>	<b>\$ 1,684,812</b>

8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	5,491,314	3,513,692
February	6,565,477	4,326,951
March	\$6,835,134	\$3,948,347
April	\$6,696,212	\$3,575,989
May	\$6,635,950	\$3,589,037
June	\$5,822,405	\$3,235,600
July	\$4,896,856	\$2,842,781
August	\$3,985,502	\$2,408,625
September	\$3,622,215	\$2,156,052
October	\$3,484,590	\$2,079,008
November	\$3,890,963	\$2,440,568
December	\$5,660,873	\$3,488,332
<b>(sum of #8b must be less than 12b)</b>	<b>\$ 63,587,490</b>	<b>\$37,604,982</b>
	<b>\$ 5,298,958</b>	<b>\$3,133,749</b>

9. Total Number(#) Residential Payment Troubled Customers By Month:		
January	8472	7425
February	8929	7842
March	9419	8253
April	9678	8461
May	10618	9222
June	11104	9608
July	11221	9754
August	11065	9717
September	10988	9685
October	10756	9531
November	10494	9365
December	10328	9223
<b>(#9 must be less than #6)</b>	<b>123,072</b>	<b>108,086</b>
	<b>10,256</b>	<b>9,007</b>

10. Total Number(#) Terminations - By Month:		
January	26	0
February	21	0
March	20	2
April	2,177	1,625
May	1,485	1,049
June	1,294	955
July	1,302	1,032
August	1,329	954
September	892	670
October	486	381
November	22	6
December	1	0
<b>(Must be less than #6 each month)</b>	<b>9,055</b>	<b>6,674</b>
	<b>755</b>	<b>556</b>

11. Total Number(#) Reconnections - By Month:		
January	29	9
February	25	4
March	6	4
April	636	459
May	638	425
June	419	272
July	427	283
August	530	358
September	554	397
October	585	350
November	373	228
December	100	43
<b>(must be less than #6 in each month)</b>	<b>4,322</b>	<b>2,832</b>
	<b>360</b>	<b>236</b>

12. Total Number(#) Low Income Households (Accounts) (Estimated)	68,043
<b>(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document)</b>	

12B. Annual Residential Revenues (\$)	\$ 219,614,215	\$ 31,883,003
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**Universal Service Reporting Requirements - Input Document**

Program Reporting	
<b>UGI GAS - LIURP</b>	<b>2013</b>
13. Program Costs (\$)/Actual Spending for the Year Just Completed	438,032
14. Number of Family Members Under Age 18	1.56
15. Number of Family Members Over Age 62	0.16
16. Family Size	3.24
17. Income (\$)	19,353

18. Source of Income	
Employment	30
Public Assistance	5
Pension/Retirement	8
Unemployment Compensation	5
Disability	22
Other (includes Missing Data)	8

<b>19. Participation Levels By Month (#) - Reporting Year:</b>	
Heating Jobs:	
January	6
February	4
March	8
April	7
May	7
June	7
July	11
August	10
September	3
October	4
November	5
December	6
<i>total</i>	
	78

Water Heating Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

Baseload Jobs:	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

<b>20. Projected Spending for the Current Year - (\$)</b>	660,224
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<b>21. Projected Annual Production Number (#) - Current Year</b>	
Heating Jobs	94
Water Heating Jobs	0
Baseload Jobs	0

<b>22. Average Job Costs (\$)</b>	
Heating Jobs	4,330
Water Heating Jobs	0
Baseload Jobs	0

<b>22.A. Source of Intake: (gas industry only)</b>	
Distribution Company	0
Community-Based Organization	78
Other	0

<b>22.B. Participants in Multiple Programs: (gas industry only)</b>	
LIURP and CAP	47
LIURP and CARES	0
LIURP and Hardship Fund	3
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	3
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

**Universal Service Reporting Requirements - Input Document**

<b>Program Reporting</b>	
<b>UGI GAS - CAP</b>	<b>2013</b>
23. Program Costs - Administration (\$)	\$186,832
24. Program Costs - CAP Credits (\$)	\$2,237,901
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$751,379
<b>Program Costs - CAP Accounts in Arrears - (\$):</b>	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
<b>Program Costs - CAP Accounts in Arrears - (#):</b>	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.47
29. Number of Family Members Over Age 62	0.17
30. Family Size	3.0
31. Income (\$)	\$ 11,365

<b>32. Source of Income</b>	
Employment	1,510
Public Assistance	316
Pension/Retirement	716
Unemployment Compensation	301
Disability	1,174
Other (includes Missing Data)	618
	<b>4,635</b>

<b>33. Participation Levels By Month - Income at or below 50% of Poverty (#):</b>	
January	2,008
February	2,088
March	2,122
April	2,225
May	2,261
June	2,264
July	2,253
August	2,217
September	2,162
October	2,111
November	2,048
December	2,010
	<b>2,147</b>

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	2,447
February	2,384
March	2,416
April	2,516
May	2,540
June	2,462
July	2,403
August	2,352
September	2,300
October	2,204
November	2,144
December	2,140
	2,359
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	396
February	349
March	362
April	381
May	395
June	358
July	348
August	339
September	328
October	313
November	318
December	341
	352
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	291
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	388
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	103
39. Participation Level: Exists other than Defaults (#)	2,020
40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,034,459
41. Energy Assistance Benefits (number of cutomers)(#)	3,390
42. Number of Full CAP Payments by Month:	
January	2,671
February	2,798
March	2,734
April	3,179
May	3,382
June	2,739
July	3,237
August	3,125
September	3,438
October	3,278
November	2,851
December	2,460
	35,892
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 4,277,500

<b>44. Total Number of CAP Bills Rendered by Month (#):</b>	
January	4897
February	4331
March	4364
April	5183
May	5179
June	4796
July	5097
August	4882
September	4471
October	4782
November	4158
December	4419
	56559
<b>45. Total Cash Payments by CAP Customers (\$)</b>	<b>\$ 3,215,169</b>
<b>46. Number of Full, On-Time Payments (#):</b>	<b>18,527</b>

<b>46.A. Source of Intake: (gas industry only)</b>	
Distribution Company	813
Community-Based Organization	1,451
Other	0

<b>46.B. Participants in Multiple Programs: (gas industry only)</b>	
CAP and LIURP	47
CAP and CARES	3
CAP and Hardship Fund	146
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	6
CAP, CARES and Hardship Fund	1
CAP, LIURP, CARES and Hardship Fund	0

**Universal Service Reporting Requirements - Input Document**

<b>UGI GAS - CARES</b>	<b>2013</b>
47. Program Costs (\$)	\$74,041
48. Number of Family Members Under Age 18	0.5
49. Number of Family Members Over Age 62	0.42
50. Family Size	1.64
51. Income (\$)	\$10,603

<b>52. Source of Income:</b>	
Employment	4
Public Assistance	0
Pension/Retirement	4
Unemployment Compensation	0
Disability	1
Other (includes Missing Data)	5
	14

<b>53. Participation Levels By Month:</b>	
January	0
February	2
March	4
April	4
May	0
June	2
July	0
August	0
September	1
October	1
November	0
December	0
	14

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$1,116
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	7
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$65
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	1
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$2,883,726
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	15,851
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$611,326
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	2,066
62. Direct Dollars Applied to CARES Accounts (dollars)(\$)	\$1,963
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	10
64. CARES Benefits (#) - Number of Customers Referred to CARES	14
65. CARES Benefits (#) - Number of Customers Accepted into CARES	14

65.A. Source of Intake: (gas industry only)	
Distribution Company	14
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	0
CARES and CAP	3
CARES and Hardship Fund	1
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	0
CARES, CAP and Hardship Fund	1
Cares, LIURP, CAP and Hardship Fund	0

**Universal Service Reporting Requirements - Input Document**

UGI GAS - Hardship Fund	2013
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$0
b. Administrative Costs from Shareholders (\$)	\$6,540
67. Number of Family Members Under Age 18	1.55
68. Number of Family Members Over Age 62	0.14
69. Family Size	3.18
70. Income (\$)	\$17,282.00

71. Source of Income:	
Employment	299
Public Assistance	16
Pension/Retirement	26
Unemployment Compensation	61
Disability	177
Other (includes Missing Data)	77

<b>72. Participation Levels By Month (#):</b>	
Nov	90
Dec	76
Jan	45
feb	121
Mar	31
Apr	13
May	68
June	33
July	28
Aug	80
Sept	59
Oct	12
<b>total</b>	<b>656</b>

<b>73. Ratepayer/Employee Contributions (\$)</b>	<b>\$72,705</b>
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<b>74. Special Contributions (\$):</b>	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	\$0
Other	\$0

<b>75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)</b>	<b>\$ 40,000.00</b>
<b>76. Utility Contributions (\$) - (excluding #66 and #75)</b>	<b>\$16,000</b>
<b>77. Utility Contributions (\$) - (dependent upon a match from customer contributions)</b>	<b>\$ 16,000.00</b>

<b>78. Outreach Contacts (Name of Agency, Address and Telephone # by County )</b>	
(This is a separate list)	

<b>Hardship Fund Benefits:</b>	
<b>79. Cash Benefits (number of grants)(#)</b>	<b>656</b>
<b>80. Cash Benefits (dollars in grants)(\$)</b>	<b>\$178,752.00</b>

<b>80.A. Source of Intake: (gas industry only)</b>	
Distribution Company	0
Community-Based Organization	656
Other	0

<b>80.B. Participants in Multiple Programs: (gas industry only)</b>	
Hardship Fund and LIURP	11
Hardship Fund and CAP	164
Hardship Fund and CARES	1
Hardship Fund, LIURP and CAP	6
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	1
Hardship Fund, LIURP, CAP and CARES	0

<b>UGI GAS Collection</b>	<b>2012 All Residential</b>	<b>2012 Confirmed Low Income</b>
1. Total Number(#) - Payment Arrangements	36,894	30,023
2. Total Number(#) - Successful Payment Arrangements	15,098	10,447
<b>(#2 must be less than #1)</b>		
3. Annual Collection Operating Expenses (\$)	\$2,734,654	\$1,886,912
4. Total Dollar Amount(\$) Gross Residential Write-Offs	\$4,885,688	\$4,107,602
5. Total Dollar Amount(\$) Net Residential Write-offs	\$3,467,478	\$3,503,211
6. Total Number(#) Residential Customers - By Month:		
January	315,064	39,363
February	316,137	40,323
March	316,874	41,349
April	317,320	41,085
May	316,261	40,764
June	316,315	40,067
July	315,772	39,427
August	315,972	38,730
September	316,572	37,738
October	318,071	37,839
November	320,384	38,215
December	321,294	38,465
	<b>3,806,036</b>	<b>473,365</b>
	<b>317,170</b>	<b>39,447</b>
7.A. Total Number(#) Residential Accounts in Arrears on Agreements - By Month:		
January	2,293	1,621
February	3,419	2,658
March	5332	4,503
April	6368	5301
May	6074	5255
June	5556	4859
July	4795	4321
August	3662	3265
September	3067	2744
October	3081	2697
November	1924	1642
December	1548	1196
<b>(#7A must be less than #6)</b>	<b>47,119</b>	<b>40,062</b>
	<b>3,927</b>	<b>3,339</b>
7.B. Total Number(#) Residential Accounts in Arrears not on Agreements - By Month:		
January	23,675	10,480
February	19,842	9,005
March	20599	8,480
April	22697	9,047
May	22409	9,023
June	22748	9,216
July	22932	9,279
August	21543	8,597
September	21584	8,502
October	19740	7,619
November	21430	8,777
December	24521	10,288
<b>(#7b must be less than #6)</b>	<b>263,720</b>	<b>108,313</b>
	<b>21,977</b>	<b>9,026</b>

8.A. Total Dollar Amount(\$) Residential Accounts in Arrears on Agreements - By Month		
January	\$768,990	582,837
February	\$1,430,549	1,165,561
March	\$2,505,055	\$2,189,548
April	\$2,762,596	\$2,411,036
May	\$2,375,666	\$2,132,795
June	\$1,926,228	\$1,748,709
July	\$1,504,655	\$1,399,704
August	\$1,070,110	\$987,926
September	\$873,708	\$808,070
October	\$800,582	\$726,149
November	\$492,317	\$447,128
December	\$416,154	\$343,043
<b>(Sum of #8a must be less than sum of #12b)</b>	<b>\$ 16,926,610</b>	<b>\$ 14,942,506</b>
	<b>\$ 1,410,551</b>	<b>\$ 1,245,209</b>

8.B. Total Dollar Amount(\$) Residential Accounts in Arrears not on Agreements - By Month		
January	5,614,367	3,427,060
February	5,970,836	3,690,301
March	\$6,169,017	\$3,456,277
April	\$5,485,843	\$2,947,128
May	\$4,839,973	\$2,621,630
June	\$4,147,051	\$2,328,925
July	\$3,532,339	\$2,008,931
August	\$2,958,123	\$1,692,975
September	\$2,662,413	\$1,514,770
October	\$2,169,211	\$1,225,709
November	\$2,669,845	\$1,599,672
December	\$4,002,396	\$2,391,805
<b>(sum of #8b must be less than 12b)</b>	<b>\$ 50,221,414</b>	<b>\$28,905,183</b>
	<b>\$ 4,185,118</b>	<b>\$2,408,765</b>

9. Total Number(#) Residential Payment Troubled Customers - By Month:		
January	9091	7733
February	9348	7933
March	10142	8745
April	10186	8798
May	10470	9013
June	10337	8916
July	9868	8613
August	9143	8033
September	8711	7682
October	8183	7263
November	8102	7180
December	8073	7127
<b>(#9 must be less than #6)</b>	<b>111,654</b>	<b>97,036</b>
	<b>9,305</b>	<b>8,086</b>

10. Total Number(#) Terminations - By Month:		
January	8	0
February	13	0
March	6	3
April	1,819	1,368
May	1,484	1,092
June	1,470	1,125
July	1,346	1,056
August	977	767
September	590	460
October	512	397
November	201	159
December	8	2
<b>(Must be less than #6 each month)</b>	<b>8,434</b>	<b>6,429</b>
	<b>703</b>	<b>536</b>

11. Total Number(#) Reconnections - By Month:		
January	30	9
February	30	15
March	9	3
April	412	273
May	585	409
June	471	338
July	528	376
August	495	374
September	414	300
October	587	373
November	371	217
December	58	31
<b>(must be less than #6 in each month)</b>	<b>3,990</b>	<b>2,718</b>
	<b>333</b>	<b>227</b>

12. Total Number(#) Low Income Households (Accounts) (Estimated)	68,043
<b>(#12 must be less than #6 for a "all residential" and must be Submit Estimation Methodology in a Separate Document</b>	

12B. Annual Residential Revenues (\$)	\$ 196,428,979	\$ 30,969,383
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#### Universal Service Reporting Requirements - Input Document

Program Reporting	
UGI GAS - LIURP	2012
13. Program Costs (\$)/Actual Spending for the Year Just Completed	797,306
14. Number of Family Members Under Age 18	1.63
15. Number of Family Members Over Age 62	0.16
16. Family Size	3.41
17. Income (\$)	18,954

18. Source of Income	
Employment	60
Public Assistance	7
Pension/Retirement	9
Unemployment Compensation	8
Disability	33
Other (includes Missing Data)	15

<b>19. Participation Levels By Month (#) - Reporting Year:</b>	
<b>Heating Jobs:</b>	
January	4
February	6
March	14
April	24
May	15
June	13
July	10
August	7
September	3
October	5
November	12
December	19
<i>total</i>	132

<b>Water Heating Jobs:</b>	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

<b>Baseload Jobs:</b>	
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0

<b>20. Projected Spending for the Current Year - (\$)</b>	483,664
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<b>21. Projected Annual Production Number (#) - Current Year</b>	
Heating Jobs	69
Water Heating Jobs	0
Baseload Jobs	0

<b>22. Average Job Costs (\$)</b>	
Heating Jobs	4,991
Water Heating Jobs	0
Baseload Jobs	0

<b>22.A. Source of Intake: (gas industry only)</b>	
Distribution Company	0
Community-Based Organization	132
Other	0

<b>22.B. Participants in Multiple Programs: (gas industry only)</b>	
LIURP and CAP	84
LIURP and CARES	0
LIURP and Hardship Fund	9
LIURP, CAP and CARES	0
LIURP, CAP and Hardship Fund	2
LIURP, CARES and Hardship Fund	0
LIURP, CAP, Cares and Hardship Fund	0

#### Universal Service Reporting Requirements - Input Document

<b>Program Reporting</b>	
<b>UGI GAS - CAP</b>	<b>2012</b>
23. Program Costs - Administration (\$)	\$196,945
24. Program Costs - CAP Credits (\$)	\$1,985,450
25. Program Costs - Preprogram Arrearage Forgiveness (\$)	\$480,384
<b>Program Costs - CAP Accounts in Arrears - (\$):</b>	
26.A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (\$)	0
26.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (\$)	0
<b>Program Costs - CAP Accounts in Arrears - (#):</b>	
27. A. Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)	0
27.B. Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)	0
28. Number of Family Members Under Age 18	1.38
29. Number of Family Members Over Age 62	0.18
30. Family Size	3.0
31. Income (\$)	\$ 10,472

<b>32. Source of Income</b>	
Employment	1,246
Public Assistance	929
Pension/Retirement	385
Unemployment Compensation	285
Disability	854
Other (includes Missing Data)	591
	4,290

<b>33. Participation Levels By Month - Income at or below 50% of Poverty (#):</b>	
January	2,438
February	2,437
March	2,464
April	2,443
May	2,393
June	2,347
July	2,287
August	2,225
September	2,172
October	2,130
November	2,090
December	2,041
	2,289

34. Participation Levels by Month - Income between 51% and 100% of Poverty (#):	
January	3,419
February	3,423
March	3,498
April	3,503
May	3,471
June	3,386
July	3,304
August	3,138
September	3,032
October	2,855
November	2,707
December	2,568
	3,192
35. Participation Levels by Month - Income between 101% and 150% of Poverty (#):	
January	757
February	770
March	781
April	781
May	735
June	692
July	677
August	622
September	588
October	528
November	485
December	432
	654
36. Participation Level: Default Exits - Income at or below 50% of Poverty (#)	645
37. Participation Level: Default Exits - Income between 51% and 100% of Poverty (#)	1,453
38. Participation Level: Default Exits - Income between 101% and 150% of Poverty (#)	646
39. Participation Level: Exists other than Defaults (#)	920
40. Energy Assistance Benefits (total dollars)(\$)	\$ 1,416,047
41. Energy Assistance Benefits (number of cutomers)(#)	4,252
42. Number of Full CAP Payments by Month:	
January	3,462
February	4,011
March	4,769
April	6,597
May	4,391
June	3,438
July	3,911
August	5,571
September	2,114
October	2,515
November	2,824
December	2,649
	46,252
CAP Benefits:	
43. Total Annual CAP Billed Amount -(used to calculate Average Cap Bills) (\$)	\$ 6,066,566

<b>44. Total Number of CAP Bills Rendered by Month (#):</b>	
January	6542
February	6215
March	6815
April	6471
May	6709
June	6351
July	6109
August	6168
September	5129
October	5788
November	4935
December	4821
	72053
<b>45. Total Cash Payments by CAP Customers (\$)</b>	<b>\$ 4,492,585</b>
<b>46. Number of Full, On-Time Payments (#):</b>	<b>21,089</b>

<b>46.A. Source of Intake: (gas industry only)</b>	
Distribution Company	725
Community-Based Organization	1,325
Other	0

<b>46.B. Participants in Multiple Programs: (gas industry only)</b>	
CAP and LIURP	84
CAP and CARES	6
CAP and Hardship Fund	124
CAP, LIURP and CARES	0
CAP, LIURP and Hardship Fund	2
CAP, CARES and Hardship Fund	0
CAP, LIURP, CARES and Hardship Fund	0

**Universal Service Reporting Requirements - Input Document**

<b>UGI GAS - CARES</b>	<b>2012</b>
47. Program Costs (\$)	\$63,536
48. Number of Family Members Under Age 18	1.5
49. Number of Family Members Over Age 62	0.33
50. Family Size	3.05
51. Income (\$)	\$12,960

<b>52. Source of Income:</b>	
Employment	4
Public Assistance	1
Pension/Retirement	3
Unemployment Compensation	0
Disability	4
Other (includes Missing Data)	6
	18

<b>53. Participation Levels By Month:</b>	
January	0
February	0
March	0
April	1
May	1
June	0
July	8
August	1
September	2
October	1
November	3
December	1

54. Energy Assistance Benefits (\$) - LIHEAP Cash Grants (dollars)(CARES)	\$605
55. Energy Assistance Benefits (#) - LIHEAP Cash Grants (number of customers)(CARES)	5
56. Energy Assistance Benefits (\$) - LIHEAP Crisis Grants (dollars)(CARES)	\$449
57. Energy Assistance Benefits (#) - LIHEAP Crisis Grants (number of customers)(CARES)	2
58. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Cash Grants (dollars)(All Customers)	\$4,604,937
59. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (number of customers)(All Customers)	28,395
60. Energy Assistance Benefits (\$) - Outreach Efforts - LIHEAP Crisis Grants (dollars)(All Customers)	\$434,222
61. Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (number of customers)(All Customers)	1,798
62. Direct Dollars Applied to CARES Accounts (dollars)(\\$)	\$2,546
63. Direct Dollars Applied to CARES Accounts (cust.)(#)	11
64. CARES Benefits (#) - Number of Customers Referred to CARES	18
65. CARES Benefits (#) - Number of Customers Accepted into CARES	18

65.A. Source of Intake: (gas industry only)	
Distribution Company	18
Community-Based Organization	0
Other	0

65.B. Participants in Multiple Programs: (gas industry only)	
CARES and LIURP	1
CARES and CAP	6
CARES and Hardship Fund	2
CARES, LIURP and CAP	0
CARES, LIURP and Hardship Fund	1
CARES, CAP and Hardship Fund	0
Cares, LIURP, CAP and Hardship Fund	0

#### Universal Service Reporting Requirements - Input Document

UGI GAS - Hardship Fund	2012
66. Program Costs (Administrative Costs Only):	
a. Administrative Costs from Rate Base (\$)	\$8,800
b. Administrative Costs from Shareholders (\$)	\$0
67. Number of Family Members Under Age 18	1.49
68. Number of Family Members Over Age 62	0.11
69. Family Size	3.12
70. Income (\$)	\$17,543.00

71. Source of Income:	
Employment	388
Public Assistance	48
Pension/Retirement	26
Unemployment Compensation	87
Disability	191
Other (includes Missing Data)	93

72. Participation Levels By Month (#):	
Nov	55
Dec	71
Jan	52
feb	73
Mar	100
Apr	88
May	86
June	83
July	78
Aug	73
Sept	44
Oct	30
<b>total</b>	<b>833</b>

73. Ratepayer/Employee Contributions (\$)	\$87,185
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74. Special Contributions (\$):	
Citizens Energy Corporation	\$0
Companies Other Than Utilities	\$0
Settlements and Fines	
Other	\$94,549

75. Utility Contributions (\$) - Initial grant (excluding admin.\$ and grants dependent on ratepayer match)	\$ 40,000.00
76. Utility Contributions (\$) - (excluding #66 and #75)	\$16,000
77. Utility Contributions (\$) - (dependent upon a match from customer contributions)	\$ 16,000.00

78. Outreach Contacts (Name of Agency, Address and Telephone # by County )	
(This is a separate list)	

Hardship Fund Benefits:	
79. Cash Benefits (number of grants)(#)	833
80. Cash Benefits (dollars in grants)(\$)	\$255,977.00
80.A. Source of Intake: <b>(gas industry only)</b>	
Distribution Company	0
Community-Based Organization	833
Other	0

80.B. Participants in Multiple Programs: <b>(gas industry only)</b>	
Hardship Fund and LIURP	14
Hardship Fund and CAP	123
Hardship Fund and CARES	0
Hardship Fund, LIURP and CAP	6
Hardship Fund, LIURP and CARES	0
Hardship Fund, CARES and CAP	0
Hardship Fund, LIURP, CAP and CARES	0

**Response of UGI to CAUSE-PA I-16****Question 16** (Prepared by Robert Stoyko)

How many CAP customers had their service involuntarily terminated for non-payment of service during the following periods:

- a. December 1, 2012 – March 31, 2013
- b. April 1, 2013 – November 30, 2013
- c. December 1, 2013 – March 31, 2014
- d. April 1, 2014 – November 30, 2014
- e. December 1, 2014 – March 31, 2015
- f. April 1, 2015 – November 30, 2015
- g. December 1, 2015 – the date of this response

**Response:**

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the CAP status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. 0

f. 1,304

g. 0

No Digital Attachments Found.

## Response of UGI to CAUSE-PA I-17

**Question 17** (Prepared by Robert Stoyko)

In reference to the terminations identified in CAUSE-PA I-16 (a)-(g), please separately indicate the average number of days and/or months the customers remained without service for each date range.

*Response:*

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the CAP status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. Not Applicable

f. 45

g. Not Applicable

The data above represents customers restored under the same name as of March 1, 2016.

No Digital Attachments Found.

**Response of UGI to CAUSE-PA I-18****Question 18** (Prepared by Robert Stoyko)

How many non-CAP, confirmed low-income customers had their service involuntarily terminated during the periods indicated in CAUSE-PA I-16 (a) – (g), separated by date range?

*Response:*

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the Low Income status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

e. 1

f. 5,917

g. 1

The answers in e and g were the result of shut off errors.

No Digital Attachments Found.

## Response of UGI to CAUSE-PA I-19

**Question 19** (Prepared by Robert Stoyko)

Of the customer terminations listed in response to CAUSE-PA I-18, please identify for each date range:

- a. The average number of days and/or months the customers remained without service;
- b. the number of terminated low-income customers who were referred to CAP; and
- c. the number of terminated low-income customers who were enrolled in CAP.

*Response:*

The company is not able to provide answers for a, b, c, and d. Customer termination information maintained by the Company prior to calendar year 2015 does not reflect the Low Income status of the customer at the time of termination. Upon consultation with PA-Cause, the Company has provided a response to subsections (e), (f) and (g). In response to subsection (e) the Company has provided the requested information for January 1, 2015 – March 31, 2015.

- a. This response refers to CAUSE-PA-I-18 for the following subsections:
  - e. Not applicable as service was restored under a new party.
  - f. 50
  - g. Service is not restored. UGI attempts at contact are unanswered. The property appears vacant.
- b. Not applicable. Customers are solicited for CAP prior to the termination.
- c. Not applicable. CAP solicits and enrollments would occur only upon successful restoration.

The data in answer a.-c. represents customers restored under the same name as of March 1, 2016.

No Digital Attachments Found.

\*\*BEGIN PROPRIETARY\*\*



















































































ATTACHMENT CAUSE-PA II-3-3  
CONFIDENTIAL  
R. R. STOYKO























**\*\*END PROPRIETARY\*\***

**Response of UGI to CAUSE-PA II-4**

**Question 4** (Prepared by Robert Stoyko)

Please provide a list of all trainings conducted in the last five years for each contractor listed in response to CAUSE-PA I-25, and indicate the date and location of the trainings and the time allotted to for each training. Include a detailed agenda for each training and a summary of the substantive topics covered, and indicate whether the training was mandatory for all or some call center employees.

*Response:*

Upon consultation with CAUSE-PA, the company is providing a response for Calendar Year 2015. Please see Attachment CAUSE-PA II-4.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA II-4.pdf</a>	

Training Date	Agency	Training Location	Allocated Training Time	Attendees	# of Attendees	Training Type	Topics
01/08/15	Call Center Representatives	Reading	2 hours	Call Center Trainee Representatives	2	Outreach Overview	Review of USP and UGI Assistance Programs
1/13/2015	Central PA Comm Action	Webinar	4 Hours	New Caseworker	1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion
1/14/2015	Call Center Representatives	Reading	1.5 hours	Call Center Billing Representatives	6	Operation Share	Review of Operation Share Call Center Training Manual
1/22/2015	Reading Salvation Army	301 S. 5th St. Reading	4 Hours	New Caseworkers	4	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion
2/3/2015	Reading Salvation Army	301 S. 5th St. Reading	2 Hours 1.5 hours	New Caseworkers	2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
2/12/2015	Call Center Representatives	Reading		Call Center Trainee Representatives New Caseworkers	5	Outreach Overview	Review of USP and UGI Assistance Programs
02/19/15	SOLAIRE Energy, Inc.	UGI Wilkes Barre Office	5 Hours	New Caseworker	4	Customer Outreach System (COS) LIURP Training	COS: Third Party Processes; Electric Account Processes
2/26/2015	CEO of Hazleton	100 W Broad St, Hazleton	2 Hours	New Caseworkers	1	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
3/3/2015	Project Share of Carlisle	Webinar	2 Hours	New Caseworkers	2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
03/11/15	TREHAB	Webinar	4 Hours		3	LIURP Caseworker Traininig	LIURP Processes: Intake, Audit, Measure Entry, Job Completion, Customer Follow up
03/18/15	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives New Caseworker	4	Outreach Overview	Review of USP and UGI Assistance Programs
3/20/2015	Hazleton CEO	Webinar	4 Hours		1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion,
03/25/15	All LIURP Caseworkers	UGI Wilkes Barre Office	8 Hours	All contracted 2015 LIURP Agencies	35	LIURP Adminitrator Workshop	COS Enhancements, LIURP Training Manual, LIURP Processes, 2015 Contract, Budget, Invoicing
5/7/2015	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Trainee Representatives New Caseworkers	1	Outreach Overview	Review of USP and UGI Assistance Programs
6/3/2015	Harrisburg Salvation Army	1122 Green St, Harrisburg	2 Hours		2	Operation Share Program Training	Review of Operation Share Caseworker Training Manual
7/15/2015	All Agencies	Wilkes-Barre, Mohegan Sun Pocono	8 Hours	All CAP Caseworkers New Caseworkers	72	CAP - Updates on Universal Service Plan Changes	Universal Service Plan changes. New CAP Rules. High Usage Energy Conservation presentation.
07/22/15	TREHAB	36 Public Ave Montrose, PA	4 Hours		4	Collection of LIURP Process	Quality Control and COS review for Caseworker; Budget and Quaterly goals with Administrators

8/6/2015	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Trainee Representatives New Caseworkers	5	Outreach Overview	Review of USP and UGI Assistance Programs
08/18/15	TREHAB	Webinar	2 Hours		2	LIURP Caseworker Traininig	COS, LIURP Processes: Intake, Audit, Measure Entry, Job Completion, Customer Follow up
08/28/15	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives	5	Outreach Overview	Review of USP and UGI Assistance Programs
09/22/15	All LIURP Caseworkers	Penn College of Technology - NSSC	8 Hours	All contracted 2015 LIURP Agencies	29	Annual LIURP Contractors Workshop	Measure Installation, Safety Testing
09/29/15	All LIURP Caseworkers	Penn Collegev of Technology - NSSC	8 Hours	All contracted 2015 LIURP Agencies New Caseworker	27	Annual LIURP Workshop	Measure Installation, Safety Testing Review of Operation Share Caseworker Training
10/6/2015	Reading Salvation Army	301 S 5th St, Reading	2 Hours		1	Operation Share Program Training	Manual
10/26/15	Berks County BeWise	Crown Plaza Reading	8 Hours 1.5 hours	Community event	200+	LIURP Program Overview & Round Table	Presented on Panel for Outreach Programs, Theresa presented in session covering LIURP
10/26/2015	Call Center Representatives	Wilkes Barre		Call Center Trainee Representatives	3	Outreach Overview	Review of USP and UGI Assistance Programs
11/12/15	Pure Energy	UGI Reading Office	2 Hours	Pure Energy New Caseworker	1	CAP High Usage Process	Customer Energy Education Review of Operation Share Caseworker Training
11/13/2015	Allentown Salvation Army United Way of Lancaster County	144 N 8th St, Allentown	3 hours		1	Operation Share Program Training	Manual
11/16/15		Lancaster United Way	3 hours 1.5 hours	Lancaster County Caseworkers Call Center Billing Representatives	50	Round Table	Review of USP and UGI Assistance Programs
12/3/2015	Call Center Representatives	Reading		Call Center Billing Representatives	7	Operation Share	Review of Operation Share Call Center Training Manual
12/3/2015	Call Center Representatives	UGI	2 hours	New Caseworkers	5	CAP	Program Rules, Benefits, Requirements
12/8/2015	Allentown Sal Army All Contracted Community Partners, interested parties	144 N. 8th St, Allentown	4 Hours	Registered Attendees	2	CAP Caseworker Training Updates on Universal Service Programs	CAP Solicitation, Enrollment, Recertification, Task Completion,
12/16/2015	All Contracted Community Partners, interested parties	Webinar	1 Hour	Registered Attendees	10	Updates on Universal Service Programs	Updates on Universal Service Programs and changes
12/18/2015		Webinar	1 Hour		15	Updates on Universal Service Programs	Updates on Universal Service Programs and changes
12/21/2015	Call Center Representatives	Wilkes Barre	1 hour	Call Center Trainee Representatives New Caseworker	6	Outreach Overview	Review of USP and UGI Assistance Programs
1/11/2016	NHS	UGI Reading Office	4 hours		1	CAP Caseworker Training	CAP Solicitation, Enrollment, Recertification, Task Completion,
1/12/2016	Call Center Representatives	Reading	1 hour	Call Center Trainee Representatives	4	Outreach Overview	Review of USP and UGI Assistance Programs
1/28/2016	Call Center Representatives	Wilkes Barre	4 hours	Call Center Billing Representatives	6	CAP	Review of COS & Billing
1/28/2016	Call Center Representatives	Wilkes Barre	1.5 hours	Call Center Billing Representatives	5	LIHEAP	Review of LIHEAP Program
2/10/2016	Call Center Representatives	Reading	2 hours	Call Center Billing Representatives	8	Full Billing Training	Review of Billing for all Assistance Programs

### Response of UGI to CAUSE-PA II-8

**Question 8** (Prepared by Robert Stoyko)

Please list every instance in which a Social Security Number is requested or required from a UGI applicant or customer – including any requirements for production of a Social Security Number in the course of enrollment in Universal Service programs. For each instance, please:

- a. Identify whether the SSN is requested or required.
- b. Explain the purpose of requesting or requiring the number.
- c. Indicate any exceptions and/or accepted alternative documentation.
- d. Provide the portions of UGI's call scripts which request or require the information.

*Response:*

- a. On a request for service, an applicant is screened for prior UGI service and their payment history. If they did not have service, or if they had poor payment history, we run an Experian TEC report which requires a SSN.
- b. We request the SSN to perform the credit check. When we do not have prior UGI service history, the SSN is used to verify identity as well as credit worthiness.
- c. If an applicant does not wish to provide their SSN, they are permitted to provide their address from their license or State ID.
- d. Please see Attachment CAUSE-PA II-8.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA II-8.pdf</a>	

## **Residential Applications**

(Phase 1 of training)

### **Definitions:**

- **Customer** – A natural person at least 18 years of age in whose name a residential service account is listed and who is primarily responsible for payment of bills rendered for the service or an adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested. A natural person remains a customer after discontinuance or termination until the final bill for service is past due. Any customer who needs service at another address does not have to go through the whole application process to get new service. Normally, they would not have to pay a security deposit. Exceptions to this are when they are applying for concurrent service or they have a current termination notice for their current account.
- **Applicant** – Any natural person at least 18 years of age not currently receiving service who applies for residential service provided by a public utility or any adult occupant whose name appears on the mortgage, deed, or lease of the property for which the residential public utility service is requested.
- **Concurrent Service** – When a customer has more than one account active at the same time.
- **Foreign Load** – Refers to the registration on a customer's meter that is not used directly and solely by the customer, of which the customer has no prior knowledge, and for which the customer receives no compensation or financial consideration. Foreign loads accounts **must** be in the name of the property owner. A tenant cannot be responsible for this service.
- **Landlord/Tenant** – When the utility service is in the landlord's name but a tenant or tenants are living at the property and benefiting from the service.
- **Ratepayer/Occupant** – An individual or organization that is not the property owner and does not have any connections with the property but would be putting the utility service in their name for someone else. An example of this would be a company or organization putting service in their name for an employee or a parent putting service in their name for a child that is a college student.

### **Scope:**

In accordance with PUC regulations, all residential applicants who do not meet our credit standards must be notified in writing of the reason for the denial of service. Requesting a security deposit implies a denial of service even when we are billing it on the first bill. This procedure is designed to show the CCR proper handling for each scenario when a customer or an applicant is applying for service. The procedure will explain what information the CCR is required to ask a customer/applicant when applying for service, when to approve or deny service, and when the call may need to be transferred to the credit queue to complete the application for service.

If a customer or an applicant is calling because he/she was shut off for non-payment and wants service reconnected, the call will need to be transferred to the credit queue at extension 7809.

**Procedure:**

Before taking an application for service, always review MEMC and ACNX for recent activity. If the Gas/Electric is on, check KAHR to see if there is a current shut-off notice.

If the account has a status of **Inactive, Removed, or is a 26 account**:

- **UGI Gas** - Please follow your Inactive, Removed, 26 Accounts procedure.
- **PNG Gas** – You must rely on MEMC & work order history (ACNX & JADX) to determine if the service has been cut. Look for any orders that start with the letter “G” and documentation stating whether or not the service was cut. If the service was cut, do not take an application. Transfer the caller to the Internal Sales Group (ISG) at Extension 7829. If there are no work orders or documentation stating service was cut, it is o.k. to take an application for service.
- **Electric** – If the status is removed, the caller needs to be transferred to New Installs at Extension 7822. Otherwise, it is o.k. to take an application for service.

**Important information related to residential applications:**

- Always verify you are speaking directly to the person responsible for the service. If somebody other than the responsible person calls, take as much information as possible and issue a turn-on hold. The order cannot be released until the person responsible calls to authorize the service in his/her name.
- It is o.k. to release the work order for a legal power of attorney as long as UGI is provided proof.
- Calls from an interpreter will be accepted provided the customer/applicant is present.
- Always scan UGI CIS by social security number and name line 1 first. If the applicant did not have previous service with UGI, run an Experian connect check.
- An Experian connect check must be run again if the last connect check was done over 30 days ago for the same applicant.
- When a person is being transferred to the credit queue to complete an application, document the account before transferring to credit. The documentation must have all application information including Experian results and pin number (if there is a pin number).
- When issuing a turn-on hold and transferring the applicant to the credit queue, do not quote the deposit and do not put the deposit amount on the DATA screen of the work order. The credit CCR will do this.
- When releasing a turn on hold, make sure all other turn on holds at the same address are canceled.
- If a customer/applicant asks to have a security deposit split, we must do so. The deposit would be split as: 50% - 25% - 25%.
- Do not ask for a deposit if it is less than \$50.00. However, make sure the average bill is not low simply because the property has been vacant. If the usage does not appear normal, consult a Senior CCR or Supervisor.
- The default deposit amount when no other usage is available is \$180 for Residential heating accounts.

- If you see a foreign load indicator (F/L) on the bill screen, you cannot put service in a tenant's name. The service must remain in the property owner's name.
- We will allow a parent to put service in his/her name for a child that is a college student. We will also allow a company or organization to put service in their name for an employee. When doing this, the account must be coded "Ratepayer Occupant" (R/O).
- Service can only be put in the name of a person living at the property, on the mortgage, deed, or lease. We will not allow anybody else to take over service unless it's a ratepayer occupant (R/O) situation as described above.

**The outline below will be used as a guide for the steps to be followed when taking an application for service:**

- Information requested to open a new account.
- Customer transferring service.
- Applicant applying for service.

**Information requested to open a new account**

1. Address where service is being requested. Verify spelling, apartment number if applicable. If you cannot determine what apartment number the applicant/customer is responsible for, ask for the name of the last person living there or a meter number.
2. Full name of applicant/customer (including middle initial) Verify spelling.
3. Social Security number. If customer declines, run connect check with address on state identification.
4. If applicant, ask "have you ever had service with UGI"? If the answer is yes, ask where?
5. If service needs to be turned on, get the requested turn on date. If service is on, get the responsible date.
6. Owner or Renter?
  - **Owner** - Is there anybody else on the mortgage or deed? If so, who? Is this an investment property, rental?
  - **Renter** – Do you have a lease? If so, how long is the lease? Is anybody else on the lease? Who is the landlord? What is the landlord's address and phone number?

If anybody else is on the mortgage, deed, or lease, explain to the caller that UGI will be adding the other person on the mortgage, deed, or lease to the second name line. If you are told not to add them, do not add them, but document the name(s). Make the caller aware that you will not add them to the account, but they are still just as responsible for the gas/electric service as the person on the name 1 line.

7. Number of people, including children, residing at the property. (Use the income guidelines chart to determine if the household income is below poverty level). **A low income guidelines chart is given to the CCR every year. Example, page 6. If the customer is low income, the mail screen will display Low Income along with an expiration date which is one year from the date the account automates. Example, page 7.**
8. Mailing address. If the mailing address is different from the service address, the CCR must add sales tax to the DATA screen and send a Residential Tax Exemption letter (TAXE) off the letter add screen, LETA.

9. Quote tariff charge. **Example, page 8 & 9.**

10. Access:

- **Gas** - If the gas is off, get access information. Water & electric must be on to turn on the gas. If the gas is on, check to see if there is an ERT device, if there is an ERT or the meter is outside, the customer will not have to be there. If there is not an ERT and the meter is inside, we will need access information.
- **Electric** – Most of the time, we do not need access to turn on Electric. Most electric meters are outside. If the meter is inside, UGI will need access. Check the meter size code on the METI screen to determine crew headquarters. Most residential crew headquarter is 6725KO which is the default crew headquarters. **This information can be found in the DOJM manual and on Launchpad.**

### Customer transferring service

1. Check the customer's current account to check credit status.
2. Take information requested to open a new account.
3. If the customer does not have a shut off notice and does not have a delinquent balance at the current address, release the order.
  - If the customer has an active shut off notice, issue a turn on hold and transfer the customer to the credit queue, extension 7809.
  - If the customer was shut off for non-payment and now wants service at a new address, issue a turn on hold at the new address and transfer the customer to the credit queue, extension 7809.
  - If the customer is delinquent, but does not have a shut off notice and is requesting service be transferred to a new address, release the work order. You must also inform the customer the delinquent balance will be transferred to the new account. Send a MEMO to ZMCA1 to transfer the balance to the new address/account number.
  - Any customer requesting concurrent service who is not already an established CR-1 customer must pay a security deposit.

### Applicant applying for service:

**If the applicant is applying for service at an address that was shut off for non-payment (SONP) within the last 6 months, take application, do a turn on hold and transfer the call to the credit queue, extension 7809.**

1. Take information requested to open a new account.
2. Scan social security number and name line 1 in the CIS.
  - a. If the applicant had a previous account with UGI and was CR-1 with no outstanding balance, release work order, no deposit.
  - b. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance and no late penalty charges, release work order, no deposit.

- c. If the applicant had a previous account with UGI and was CR-2 with no outstanding balance, but had late fees, run an Experian connect check.
  - d. If the applicant had a previous account with UGI and was CR-3 with no outstanding balance, run an Experian connect check.
  - e. If the applicant had a previous account with UGI and was CR-3 with an outstanding balance, do a turn on hold and transfer the applicant to the credit queue, extension 7809. Credit will quote conditions for service and send a denial/user letter.
3. If the applicant did not have a previous account with UGI, run an Experian connect check.
- a. If the applicant passes the Experian connect check, release the order.
  - b. If the applicant fails the Experian connect check for deposit only:
    - i. Gas/Electric on – release the order and bill the deposit. Send USER letter.
    - ii. Gas/Electric off – do a turn on hold and deny service for deposit only. Make sure to give the applicant the deposit identification number and payment options for the security deposit payment. Send DENL letter.
4. If identification is an issue, deny for 2 forms of valid Identification and a security deposit. Identification is covered in the Experian section of the manual.

**Response of UGI to CAUSE-PA II-11**

**Question 11** (Prepared by Robert Stoyko)

What is UGI's policy and procedure for handling medical certification requests pursuant to 66 Pa. C.S. § 1406(f) and 52 Pa Code § 56.113? Please explain and provide supporting documentation, including all call scripts, written policies and procedures, internal memoranda, or other directives regarding the processing and/or handling of medical certificates.

*Response:*

Please see Attachment CAUSE-PA II-11.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA II-11.pdf</a>	

## Medical Certification

### Definitions:

**Medical Certification** – A form that can be completed by a physician, physician's assistant, or nurse practitioner certifying that a serious medical condition exists in a home and would be aggravated in the absence of utility service.

**STAY Code 51** – Medical certification STAY used to hold an account from collection activity

**KISU Hold** – Method used to extend a termination date

### Scope:

The medical certification procedure is utilized for the following reasons:

- To prevent a shut off for non-payment
- To defer collection activity
- Reconnection after shut off for non-payment
- To expedite a turn-on for an applicant. In this situation, an applicant is a customer who wishes to restore service at a property that was shut off for non-payment and the final bill is past due. This procedure does **not** pertain to brand new applicants.

### Procedure:

#### Determine Eligibility:

- Review MEMC's and STAY history for prior medical certifications
- An account is eligible for 1 medical certificate and 2 renewals
  - Renewals are per household, not per person
- If there has already been 1 medical certification and 2 renewals, review the account to see if the delinquent balance had been satisfied.
  - If the balance was satisfied, the customer is eligible
  - If the balance was not satisfied, the customer is not eligible

#### Accounts with an active shut off notice

- When a customer has an active shut off notice and cannot pay but states that a serious medical condition exists in the household, a 3 day hold must be entered via KISU. Customer should be advised to have the doctor's office call UGI immediately. If there is not an active shut off notice, just document the account via MEMC.
  - Any employee from the doctor's office may call UGI to request the form
  - UGI will not fax a medical certification form directly to the customer
  - If the doctor's office is too busy to call, they may request the form in writing via fax or email
  - If the doctor's office sends a note on a prescription pad or doctor's office letterhead, including all of the required information, we must accept this as a valid med cert.

- Once the doctor's office calls to request the medical certification form:
  - Advise the doctor's office that the form must be completed and returned to UGI as soon as possible to avoid interruption of service; or to restore service
  - The following information must be verified on the form:
    - The name of the person in the home that is ill
    - The length of time, not to exceed 30 days, that the service cannot be terminated
    - The condition will worsen without service
    - Name, office address, and office phone number of the certifying physician
  - If the completed form is not returned, the shut off procedure will automatically continue
- Once the completed form is returned, or a note on prescription pad/letterhead is received:
  - Enter a STAY code 51 for the amount of time specified on the form
    - This will automatically add the 'HBI' indicator on BILL
  - Cancel shut off activity (either by KISU or cancel DOJM order)

*\*\* Note: UGI can dispute the validity of any medical certificate by petitioning the PUC. However, the certificate is considered valid until a decision is made by the PUC.*

### **Medical Certification for Reconnection**

- A medical certification can be used to restore service after it has been shut off for non-payment, provided the service has not been terminated for more than 30 days
  - If the service has been inactive for more than 30 days, this becomes an applicant situation, not a reconnection. In this situation, a medical certificate may be used to expedite reconnection once all credit requirements have been met
- Once the completed medical certification is returned, the CCR will issue a reconnection using the job code 21-102 (gas) or 21.102 (electric)
  - Note in the COMMENTS section of the order the time by which the reconnection must be completed
  - Change the priority of the order to a '2'. This will change the color of the order on the dispatcher's system and draw attention to the order to ensure it is completed within the required timeframe
- UGI will make a diligent effort to restore service on the day of receipt of the medical certification. Check with dispatch for same day approval. If approved, FORCAD the order for today's date. In any case, the service shall be restored within 24 hours
  - Gas Accounts – if the medical certificate is received on a Friday, check with dispatch to see when the order should be scheduled

- Electric Accounts – Friday medical certificate reconnections will be done the same day
  - Prior to 4:30, an email is to be sent to EDMSR to have the order done the same day
  - After 4:30, the after-hours call out procedure is to be used
- Security deposits for gas and electric customers will be billed. On gas accounts, the reconnect fee will also be billed.
  - Reconnect fees can be billed by using the code MIS on the DATA screen
  - Security deposits should be billed in 3 installments (50%, 25%, 25%)
    - Remind the customer that any monies paid will be applied to the security deposit first
- Customer should be advised of requirements necessary upon expiration of the medical certificate
  - If a customer is not eligible for a new payment arrangement, do not offer one. The customer will have until the end of the medical certificate term to bring the prior agreement up to date

### **Expiration of Medical Certification**

- Once a medical certification expires, the original grounds for termination shall be revived
  - UGI may terminate service without additional written notice if notice was previously mailed or delivered and has not yet expired
  - If the original notice has not expired, UGI will re-start the termination process at the 3-day step
    - Notices are valid for 60 days from the date they are originally issued. If there is a protection from abuse, the notice is only valid for 30 days from the date it was originally issued

### **Special Situation Medical Certification**

- Landlord/Tenant Accounts
  - Any tenant in the affected building is entitled to a medical certification
  - The landlord is entitled to a medical certification only if he/she lives in the affected building
- Remaining Occupant & User Without Contract
  - If the ill person in question is listed on income/occupant, they are entitled to a medical certification
  - If the ill person in question is not listed on income/occupant, they are not entitled to a medical certification
- CAP (Customer Assistance Program)
  - CAP customers are eligible for 3 medical certifications per CAP balance
    - Eligibility is not based on the customer's A/R balance.

## Response of UGI to CAUSE-PA II-12

**Question 12** (Prepared by Robert Stoyko)

With respect to medical certificates, please answer the following:

- a. How many medical certificates has UGI received in the last five years, disaggregated by month?
- b. Of the customers identified in subpart (a), please identify the number of months that a medical certificate was applied to the same customer account.
- c. Under what circumstances does UGI grant a fourth request for a medical certificate?
- d. Does UGI request or require use of its own medical certificate form? If so, provide a copy of any such form and indicate whether it is requested or required.

*Response:*

- a. Please see Attachment CAUSE-PA II-12-1.
- b. The company is not able to distinguish between first time medical certificates and renewals for the same customer.
- c. UGI does not grant a fourth request for a medical certificate, unless done inadvertently.
- d. Yes, UGI's form was reviewed to be consistent with PA utilities by the Energy Association of PA. Please see Attachment CAUSE-PA II-12-2.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA II-12-1.pdf</a>	
<a href="#">CAUSE-PA II-12-2.pdf</a>	

<b>Medical Certificates</b>					
	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>
<b>January</b>	19	19	16	17	10
<b>February</b>	24	17	16	9	4
<b>March</b>	71	102	47	28	41
<b>April</b>	174	184	191	100	102
<b>May</b>	160	199	192	111	120
<b>June</b>	178	232	194	108	94
<b>July</b>	265	227	190	80	109
<b>August</b>	197	221	198	119	89
<b>September</b>	226	160	221	103	85
<b>October</b>	190	154	185	91	60
<b>November</b>	205	176	151	38	11
<b>December</b>	100	78	34	2	4
<b>TOTAL*</b>	1809	1769	1635	806	729

**\*2011, 2012, and 2013 data included temporary holds prior to receiving physician verification.**



## Emergency Medical Certification

All Fields are required information.

Please fax to 610-736-5863 when completed.

### Completed by UGI or Customer

Date: _____
Name of Customer of Record: _____
Customer Number: _____
Service Address: _____
City, State, ZIP: _____
Mail address (if different) _____
Phone Numbers: Home: _____ - _____ - _____

### Completed by Physician, Physician's Assistant or Nurse Practitioner

Name of Patient _____	
Relationship of Patient to Customer of Record _____	
I am a duly licensed physician, physician's assistant, or nurse practitioner under the laws of Pennsylvania and my office for the practice of medicine is located at: _____	
I certify that in my professional opinion the above-named patient is seriously ill and has been diagnosed with a medical condition for the anticipated length of time which requires the continuation of service to treat the medical condition.	
Utility service should, therefore, not be terminated for at least _____ days after the date on this form.	
<b>This certificate is in effect for a <u>maximum of 30 days</u>. I understand that I may be contacted to verify the statements contained herein.</b>	
<b>Signature of Physician, Physician's Assistant, or Nurse Practitioner</b>	<b>Date</b>
_____	_____
<b>License Number</b>	<b>Phone Number</b>
_____	_____ - _____ - _____

Utility service may be shut off at the above address unless this notice is completed or required information is received and signed by a physician, physician's assistant, or nurse practitioner. If utility service is currently off, service will be restored upon receipt of the completed form. Please note, the customer of record continues to have the responsibility to make a reasonable payment agreement on amounts owed to UGI Utilities, Inc.

**Response of UGI to CAUSE-PA II-25**

**Question 25** (Prepared by Robert Stoyko)

What is UGI's procedure for handling security deposit waiver pursuant to 66 Pa. C.S. § 1404 (a.1)? Provide a copy of UGI's policy and/or procedure and any written memoranda or other documents related to application of security deposit waivers.

*Response:*

UGI Gas does not require a customer or applicant that is confirmed to be eligible for a customer assistance program to provide a cash deposit. Please see Attachment CAUSE-PA II-25.

Attachment File Name	Attachment Note
<a href="#">CAUSE-PA II-25.pdf</a>	

## Chapter 14 Changes

(Effective 12/22/14)

**Applicant** – A person who’s prior service has been removed from their name for more than 30 days. (Final Bill due date no longer applies)

**Customer** – A person remains a customer until 30 days after the services have been discontinued.

**What this means for you:**

- You cannot deny a party service at a new property if their service has not been discontinued under their name for 30 days.
- After 30 days of the service being discontinued under a party’s name, they are considered an applicant and a denial/user letter is **required**.
  - If applicable, a deposit should be quoted and balance, if any.

**Security Deposits** - No public utility may require a customer or applicant that is *confirmed* to be eligible for a customer assistance program to provide a security deposit.

**Confirmed Eligible Customer** - Will have received a LIHEAP/CRISIS or Operation Share or other assistance (605) grant within the past 12 months, be a CAP customer, or have been a participant of LIURP within the past 12 months.

- Deposits will not be imposed to *confirmed* assistance eligible customers due to poor creditworthiness.
- A *confirmed* assistance eligible customer will not be quoted a deposit upon reconnection.
- Applicants and customers required to pay a deposit for reconnection shall pay the deposit in accordance with commission regulations (50%, 25%, and 25%).

**What this means for you:**

- You will not ask for income verification on an initial application.
  - If not already *confirmed* eligible for a customer assistance program and a deposit is required due to a customer’s poor payment history, you will quote the deposit.
  - If an applicant states they are not able to afford the deposit and provide you detailed information about their income that implies they are low-income, the **deposit should be waived**.
1. At that point, advise the customer you will waive the deposit and turn-on/transfer service.
  2. **Explain to the customer that failure to enroll into a customer assistance program or pay on-time, they may be assessed a deposit at a later date.** (Exception: Choice customers cannot be enrolled in CAP at this time.)

3. Send a MEMO to Outreach (ZMOUT) requesting a CAP application be sent once the service is active.
4. **DO NOT** code the “Name Type” field on the DATA screen as an “L” unless the customer is already *confirmed* eligible for a customer assistance program.

**Deposit Hold Period for Residential Customers**– A public utility may hold a deposit until a timely payment history is established for 12 consecutive months. Failure to make on-time payments for the time frame listed will result in the deposit being held indefinitely or until service is terminated or a service request is received to discontinue service.

**Deposit Interest** – Effective 1/02/2015, the interest rate for the 2015 calendar year will be 3%.

- On January 1 of each year, a new annual interest rate, if any, will be calculated.
- Interest will be applied annually to the deposit.

**Payment Agreement Guidelines** – When a customer or applicant contacts a public utility to make a payment agreement, the public utility shall:

- 1) Provide information about the public utility’s customer assistance programs
- 2) Refer the customer or applicant to the administrator of the customer assistance programs to determine eligibility for a program, and to apply for enrollment in a program

**What this means for you:**

- A customer, upon denial OR acceptance of a payment agreement shall still be provided with the additional options available to them including;
  - Assistance agency options
  - Providing proof of a Protection from Abuse Order (PFA)
  - PUC contact information
  - Providing a medical certificate

**Automatic Meter Readings** – Upon a customer request, the public utility shall secure an in-person meter reading to confirm the accuracy of the automatic meter reading device when a customer disconnects service or a new service request is received. A public utility may charge a fee, as provided in a commission-approved tariff.

**What this means for you:**

- Upon a request received from a customer to connect/disconnect service, you must provide the option to start/stop service with an estimated read, if eligible (Ex. FCALC), or to have an actual meter reading obtained while being charged a standard tariff fee.
  - Both options must be provided when eligible for an estimated read.
  - When a customer is not eligible to have their account opened/closed at no-charge, they should not be provided with the option to have a free, estimated read calculated.

**Medical Certificate** – A new medical certification form will be available on the CIC Launchpad and will need to be utilized effective 12/22/2014. The old form should no longer be sent to doctor's offices.

**Indirect Changes per Regulations:**

- We cannot make collection calls to provide a 72-hour notice prior to 8:00 a.m.
- You cannot immediately terminate service after being restored for a dishonored payment without posting a 72-hour notice first.
- We may terminate service from Monday through Thursday only.
  
- **High Balance Accounts:** We are required to report all residential accounts that have a balance over \$10,000.
- A new turn-on policy will be following in the months to come.

### Response of UGI to CAUSE-PA III-5

**CAUSE-PA-III-5** (Prepared by Robert Stoyko)  
See Attachment CAUSE-PA II-18-2.

- a. Please provide a copy of the Excel spreadsheet that is used to track CARES referrals, redacting the name and account number.
- b. Provide a copy of the contents contained in a CARES packet.

*Response:*

- a. Please see Attachment CAUSE-PA-III-5-a.
- b. Please see Attachments CAUSE-PA-III-5-b-1 through b-4.

Attachment File Name	Attachment Note
<a href="#">Attachment CAUSE-PA-III-5-a.pdf</a>	
<a href="#">Attachment CAUSE-PA-III-5-b-1.pdf</a>	
<a href="#">Attachment CAUSE-PA-III-5-b-2.pdf</a>	
<a href="#">Attachment CAUSE-PA-III-5-b-3.pdf</a>	
<a href="#">Attachment CAUSE-PA-III-5-b-4.pdf</a>	











*Dear UGI Customer:*

*Enclosed is information from UGI CARES Department.*

*The information enclosed is tips on energy savings, safety and also information on the UGI Universal Services Programs.*

*Please take time to review the packet information. If you have any questions, please call UGI at 1-800-UGI-Warm.*

*Sincerely*

*UGI Utilities, Inc.*

*Enclosures*

# Conservation Tips



You will get significant savings by lowering the water temperature setting to 120° on your water heater.



If your clothes dryer has an automatic cycle, use it, because drying more than needed wastes energy and wears out clothes.



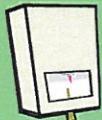
If you block or restrict air flow by placing furniture over heating and cooling registers, your heating system and air conditioner will have to work harder.



You should check and clean your dryer exhaust vent occasionally and remove lint after each load.



You should weather-strip all doors and windows or install storm windows and doors to prevent drafts.



If you keep your thermostat set on 68° in the winter, for every degree you raise or lower the setting, you can see a difference of up to 3% in energy costs.



You can keep hot water use to a minimum by washing only full loads in washers and dishwashers.



You can set up a payment plan for your winter bills that is spread out over the year, not just the winter months. Call your Electric or Gas company and ask to be set-up on Budget Billing.



Sealing air leaks is the first and most important step to home comfort.



Your hot water tank is usually the second greatest energy user in your home.



Your furnace requires routine maintenance, some from you, some from a furnace professional, in order to keep it safe and efficient.



Air leaks in and out of your home around plumbing and wiring, around windows and doors, and where walls meet ceilings.



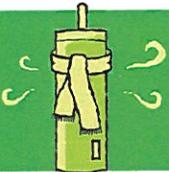
Lack of adequate weather-stripping can cost you \$50.00 or more a year in lost energy cost.



Washing clothes in cold water will not only prevents shrinking and fading, but will reduce your energy bill.



A seven minute or less shower under a two gallon per minute low-flow shower head is the more efficient than taking a bath in a bathtub full of water.



For safety reasons, wrap only the sides of a gas tank. Wrap the sides and top of an electric tank.



Install a setback thermostat which will lower the temperature while you sleep, and will raise it automatically just before you wake up.



It takes far less energy to lower the thermostat and then raise it later than to keep it set at the same setting at all times.



The more you can leave the air conditioner off, the more money you will save.



A ¼ inch gap at the base of a three-foot wide exterior door leaks as much air as a three inch hole in the wall of your home.



**Know what's below.  
Call before you dig.**

**It's the law:** Call 8-1-1 three days in advance of any digging project.

Whether performing a major excavation or minor landscaping, safeguard yourself from hazards related to damaging underground pipelines.

One **free call** gets all of your utility lines marked to help protect you from injury and costly property damage.

Safe digging is no accident. Call 8-1-1 three days before you dig.

**Scratch'n Sniff**  
Safety Guide  
FOR NATURAL GAS USERS  
Guía de seguridad  
para usuarios de gas natural

A photograph of a young child with their hand to their nose, sniffing, set against a blue background with the text 'Smell, n tell' in large white letters.



## Natural gas is naturally odorless.

That's why we add a scent. If your nose ever detects this very unique odor, you'll need to pay attention. If you smell a:

**Faint odor:** Don't panic. Just check if a pilot light is out, or if a burner is partially turned on. If you cannot find the source, don't investigate on your own. The source could be indoors or outdoors. Gas can enter your building through walls or drain lines even though your home may not be supplied with gas. Call UGI promptly.

**Strong odor:** Leave the building immediately. Do not switch anything on or off, and do not light a match or lighter. Then call our 24-hour emergency number **1-800-276-2722** from a neighbor's phone or from your mobile phone.

➤ **Scratch the blue flame** to smell the scent added to natural gas.

➤ **Rasque la llama azul** para saber cómo huele el aroma agregado al gas natural.

## El gas natural no tiene olor.

Es por ello que le hemos añadido un aroma. Si alguna vez detecta este olor peculiar, debe prestar atención. Si percibe:

**Un olor leve:** No se asuste. Compruebe que no haya ninguna llama piloto apagada ni quemadores parcialmente encendidos. Si no puede encontrar el origen del olor, no lo busque por su cuenta.

La fuente podría estar afuera o adentro. El gas puede entrar al edificio por las paredes y las descargas incluso si su casa no tiene servicio de gas. Llame rápidamente a UGI.

**Un olor fuerte:** Abandone el edificio inmediatamente. No encienda ni apague nada y no encienda cerillos o encendedores. Luego, llame a nuestro número de emergencias disponible las 24 horas al día **1-800-276-2722** desde el teléfono de un vecino o su teléfono celular.

UGI EMERGENCY PHONE NUMBER **1-800-276-2722**

## Low Income Home Energy Assistance Program (LIHEAP)

LIHEAP (Low Income Home Energy Assistance Program) is a federally funded program administered by each state that helps low income households pay their heating bills through energy assistance grants. There are two components to the LIHEAP program: CASH and CRISIS.

**CASH COMPONENT:** To be eligible for a cash grant, a customer must be responsible for home heating costs. CASH grants are payments that are applied directly to your UGI account. This is not a loan and the money does not have to be paid back.

**CRISIS COMPONENT:** Additional money may be available through a crisis grant. CRISIS grants help families who are in danger of being without heat.

*Situations include:*

- Having utility services shut-off
- Active termination notice
- Broken heating equipment
- Leaking fuel lines

Homeowners or renters whose gross annual income meets the income guidelines established for the program by the State are eligible.



To apply, a customer must have the names, Social Security numbers, proof of income for all household members and a recent heating bill.

For more information regarding this program, customers can contact UGI or their local County Assistance Office.

## C.A.R.E.S. Program

CUSTOMER ASSISTANCE REFERRALS EVALUATION SERVICES (C.A.R.E.S.)

C.A.R.E.S. provides referrals to other helpful programs in your community. UGI will send any customer regardless of income a Customer Assistance Guide and energy related information specifically for their area. These programs can include the Low Income Home Energy Assistance Program (LIHEAP), budget counseling, state Weatherization or Office of Aging programs.

### ELIGIBILITY CRITERIA

- Residential customer
- Customers experiencing a temporary personal or financial crisis

## UGI Rehabilitation Program

FOR COMMUNITY BASED ORGANIZATIONS

The Rehabilitation Program was designed by UGI Utilities, Inc. with the intent of taking a pro-active approach to the existing Low Income Usage Reduction Program (LIURP). This program allows UGI Utilities, Inc. to contribute funding for the installation of approved energy efficient measures at the time of new construction or rehabilitation of an existing property. This program provides UGI Utilities, Inc. the opportunity to partner with Community Based Organizations throughout the service territory to distribute these funds to housing projects. Any Community Based Organization interested in obtaining further information or funds through this program may contact UGI Utilities' Customer Outreach Department at mail to: [liurpteam@ugi.com](mailto:liurpteam@ugi.com).

### Additional Services offered by UGI:

- Conservation Literature
- Online Bill Pay
- Gift Credits
- Budget Billing
- Third Party Notification
- Payment Arrangements
- Extended Due Date

## Universal Service Programs



For more information please call:

1-800-UGI-WARM

1-800-844-9276



# Customer Assistance Program (CAP)

UGI's Customer Assistance Program (CAP) offers qualified low income customers assistance in managing their energy bill. The program benefits offered by CAP include:

- A personalized monthly payment based on income and average bill
- Past due debt forgiveness with on time monthly payments
- The difference between the CAP payment and the actual usage bill may also be forgiven

UGI partners with local community agencies to provide this useful program to its customers.

## ELIGIBILITY CRITERIA

To be eligible, a customer must: (1) have household gross household income at or below 150% of federal poverty level; (2) be a residential customer with active energy service.

Household Size	150% FPL Household Income
1 .....	\$17,820
2 .....	\$24,030
3 .....	\$30,240
4 .....	\$36,450
5 .....	\$42,660
6 .....	\$48,870
7 .....	\$55,095
<b>For each addition person add:</b> .....	<b>\$6,240</b>



# Low Income Usage Reduction Program

UGI's LIURP offers free weatherization measures to qualified low-income residential heating customers in order to limit heat loss and provide long-term energy savings. These energy savings measures may include window and baseboard caulking, door and window weather-stripping, attic and sidewall insulation, duct and pipe insulation, ventilation, water conservation devices, furnace inspection and energy education.

In addition, non-heating UGI Electric accounts may qualify for measures such as refrigerator replacement and high efficiency lighting.

## ELIGIBILITY CRITERIA

- An active UGI gas or electric heating account with twelve (12) or more continuous billing periods for the same account number
- Higher than average gas or electric heating usage during the twelve month period to meet specified consumption levels for the program
- Renters can qualify with written permission from landlords
- Gross Annual Income at or below 150% of Federal Poverty Level *(See CAP Income Guidelines)*
- A percentage of customers who may have extenuating circumstances can be accepted at 200% of Federal Poverty Level *(See Operation Share Income Guidelines)*



# Operation Share

The Operation Share program provides energy assistance grants to qualified customers who experience difficulty paying their heating bills. This community-based program is funded by voluntary donations from UGI employees, UGI customers and concerned citizens. In addition, UGI provides a corporate donation to help fund the program.

## ELIGIBILITY CRITERIA

- The customer must have an active UGI account
- The customer's gross income must be at or below 200% of Federal Poverty Level
- This grant may be received one time per twelve (12) month period

Household Size	200% FPL Household Income
1 .....	\$23,760
2 .....	\$32,040
3 .....	\$40,320
4 .....	\$48,600
5 .....	\$56,880
6 .....	\$65,160
7 .....	\$73,460
<b>For each addition person add:</b> .....	<b>\$8,320</b>

## Response of UGI to CAUSE-PA III-11

**CAUSE-PA-III-11** (Prepared by Robert Stoyko)

See CAUSE-PA I-11, "UGI completes an annual cross referral process. LIHEAP recipients are reviews and if eligible, a CAP application is mailed. Additionally, when calling UGI, LIHEAP recipients are referred to CAP by UGI's Customer Care Team. Calls related to past due balances or termination notices are also screened for CAP eligibility.":

- a. How many CAP applications were mailed as part of UGI's annual cross referral process?
- b. How many additional CAP enrollments were processed as a result of UGI's annual cross referral process?
- c. Did UGI perform any follow-up or make direct contact with customers who received a CAP application as part of its annual cross referral process? If yes, please explain and provide a copy of the communications.
- d. Please provide a copy of the communications and/or letter sent with the CAP applications as part of the annual cross referral process
- e. What is the difference between a CAP referral and screening for CAP eligibility? Please explain the process for each and provide supporting call scripts and/or customer communications that explain each process.
- f. Are customers who call UGI for the following reasons referred to CAP:
  - a. Past due balances
  - b. Terminations
  - c. Payment arrangements?
- g. Are customers who call UGI for the following reasons screened for CAP:
  - a. Past due balances
  - b. Terminations
  - c. Payment arrangements?

*Response:*

- a. 3,595
- b. As of the 2015 USRR report, the company reported 5,408 CAP participants received LIHEAP. The Company does not currently have the ability to track "solicits" for CAP in our Customer Outreach System. The solicit letters that are generated are completed in the company's CIS, (a separate warehouse).
- c. Any customer inquiries or follow up actions were completed by the Company's agencies.
- d. Please see Attachment CAUSE-PA I-11 Page 1 for the CAP application that is mailed to LIHEAP recipients.
- e. A CAP referral is made when we believe the customer may qualify for CAP, but do not have confirmed income or all of the customer's required information.

Screening occurs when the utility's or Community Based Organization's representative has the customer's income information. In this process, the representative is able to provide the customer all the needed information for the customer to decide to enroll, inclusive of the CAP amount. Enrollment will occur upon customer consent. This occurs when the representative identifies a caller who received LIHEAP but has not participated in CAP.

f. Yes, for a, b, and c, provided the customer appears to meet CAP eligibility requirements. Referrals are made for non LIHEAP customers who have to apply at a local community agency to confirm their low-income status.

g. Yes, for a, b, and c, provided the customer meets CAP eligibility requirements and received LIHEAP. The customer will be screened and enrolled in the program upon customer consent.

No Digital Attachments Found.

**Response of UGI to CAUSE-PA IV-2**

**CAUSE-PA-IV-2** (Prepared by Robert Stoyko)

Please indicate the number of homes served through LIURP by housing type (delineated below), disaggregated by program years 2013, 2014, 2015, and to date in 2016:

- a. single family homes
- b. individually-metered multifamily homes (units)
- c. manufactured homes

*Response:*

Please see Attachment CAUSE-PA-IV-2.

Attachment File Name	Attachment Note
<a href="#">Attachment CAUSE PA-IV-2.pdf</a>	

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
<b>Single Family Home</b>	78	88	106	3
<b>Individually Metered Multifamily homes</b>	0	0	0	3
<b>Manufactured Homes</b>	0	0	0	0

**Response of UGI to CAUSE-PA V-12**

**CAUSE-PA-V-12** (Prepared by Robert Stoyko)

Please provide a breakdown of costs and expenses, along with a description of each line item, for the CARES program for 2013, 2014, and 2015.

*Response:*

Please see Attachment CAUSE-PA-V-12.

Attachment File Name	Attachment Note
<a href="#">Attachment CAUSE-PA V-12.pdf</a>	

**ATTACHMENT CAUSE-PA V-12**

**R.R. Stoyko**

**Page 1 of 1**

	<b>2013</b>	<b>2014</b>	<b>2015</b>
Payroll	\$ 21,881	\$ 27,371	\$ 28,380
Advertising	\$ 50,492	\$ 36,977	\$ 33,499
Education Related	\$ 1,668	\$ 5,654	\$ 2,402
Total Cost	\$ 74,041	\$ 70,002	\$ 64,281

### Response of UGI to Office of Consumer Advocate (OCA) III-4

**Question 4** (Prepared by Robert Stoyko)

Reference: Lahoff, page 20. For each month since January 2012 to present inclusive, please provide:

- a. The number of CAP participants on the last day of the month;
- b. The average number of CAP participants.

*Response:*

a. Please see Attachment OCA-III-4.a

b. The average number of participants from January 2012 to January 2016 is 6,620.

Attachment File Name	Attachment Note
<a href="#">OCA III 4 a.pdf</a>	

4A. The number of CAP participants on the last day of the month.

<b>2012</b>	<b>Participants</b>	<b>2013</b>	<b>Participants</b>	<b>2014</b>	<b>Participants</b>	<b>2015</b>	<b>Participants</b>	<b>2016</b>	<b>Participants</b>
1/30/2012	6,610	1/28/2013	4,858	1/27/2014	4,706	1/26/2015	7,615	1/25/2016	7,843
2/27/2012	6,652	2/25/2013	4,832	2/24/2014	5,137	2/23/2015	7,893		
4/2/2012	6,757	4/1/2013	4,913	3/31/2014	5,697	3/30/2015	8,485		
4/30/2012	6,733	4/29/2013	5,114	4/28/2014	6,073	4/27/2015	8,845		
5/29/2012	6,616	5/28/2013	5,195	5/27/2014	6,699	5/26/2015	9,069		
6/30/2012	6,428	7/1/2013	5,086	6/30/2014	7,193	6/30/2015	9,328		
7/30/2012	6,293	7/29/2013	5,018	7/28/2014	7,323	7/27/2015	9,193		
8/27/2014	6,024	8/26/2013	4,942	8/25/2014	7,363	8/31/2015	9,257		
9/24/2012	5,812	9/30/2013	4,795	9/30/2014	7,497	9/28/2015	9,109		
10/29/2012	5,544	10/28/2013	4,649	10/27/2014	7,487	10/26/2015	8,936		
11/26/2012	5,377	11/25/2013	4,522	11/24/2014	7,494	11/30/2015	8,428		
12/31/2012	5,046	12/30/2013	4,488	12/29/2014	7,457	12/28/2015	7,973		

Note: UGI captures enrollment numbers every Monday. The data provided is for the last Monday of every month.

9/27/2015 - 3/31/2016

STATE WIDE

Cash Demographic Report (LIH660-R01)

HOUSING	ITEM	COUNT	AMOUNT	%	AVG	PAYMENT SENT	ITEM	COUNT	AMOUNT	%	AVG
	Owner	125,943	\$24,495,067	38	\$194		Electric	98,591	\$20,339,554	30	\$206
	Renter	156,695	\$33,044,085	47	\$211		FuelOil	58,364	\$13,711,347	17	\$235
	RenterWithHeat	6,100	\$650,380	2	\$107		Coal	2,540	\$443,863	1	\$175
	SubsidizedWithHeat	1,189	\$296,908	0	\$250		NaturalGas	154,917	\$29,669,311	46	\$192
	SubsidizedNoHeat	39,099	\$8,932,275	12	\$228		Kerosene	6,182	\$1,742,125	2	\$282
	Roomer	298	\$47,760	0	\$160		Propane	10,252	\$2,002,695	3	\$195
	Other	4,300	\$1,133,643	1	\$264		WoodOrOther	1,250	\$285,062	0	\$228
							BlendedFuel	1,528	\$406,161	0	\$266
<b>RACE</b>	AmericanIndian	515	\$111,804	0	\$217	<b>INCOME RANGE</b>	0 - 999	17,152	\$13,647,982	5	\$796
	Other	25,740	\$5,135,277	8	\$200		1000 - 1999	3,441	\$2,524,811	1	\$734
	NativeHawaiian	131	\$25,882	0	\$198		2000 - 2999	3,463	\$2,394,482	1	\$691
	Black	79,568	\$16,748,199	24	\$210		3000 - 3999	5,230	\$2,890,054	2	\$553
	White	220,460	\$45,171,793	66	\$205		4000 - 4999	5,456	\$2,164,510	2	\$397
	Asian	5,316	\$967,935	2	\$182		5000 - 5999	5,581	\$1,920,425	2	\$344
	Unknown	1,894	\$439,228	1	\$232		6000 - 6999	6,718	\$2,033,232	2	\$303
<b>DISABLED</b>	YES	175,722	\$27,280,374	53	\$155		7000 - 7999	8,100	\$2,140,043	2	\$264
	NO	157,902	\$41,319,744	47	\$262		8000 - 8999	13,072	\$3,013,336	4	\$231
<b>AGE 60 &amp; ABV</b>	YES	118,113	\$18,601,156	35	\$157		9000 - 9999	57,956	\$11,425,683	17	\$197
	NO	215,511	\$49,998,962	65	\$232		10000 - 10999	17,240	\$3,029,480	5	\$176
<b>AGE 5 &amp; BLW</b>	YES	63,477	\$13,635,355	19	\$215		11000 - 11999	19,676	\$3,037,637	6	\$154
	NO	270,147	\$54,964,763	81	\$203		12000 - 12999	19,248	\$2,602,398	6	\$135
<b>PAY_TYPE</b>	DIRECT	12,865	\$1,473,245	2	\$115		13000 - 13999	21,530	\$2,585,645	6	\$120
	PROVIDER	579,714	\$85,439,624	98	\$147		14000 - 14999	17,082	\$1,877,989	5	\$110
							15000 - 15999	17,999	\$1,868,364	5	\$104
							16000 - 16999	13,870	\$1,398,752	4	\$101
<b>REFUNDS</b>		3,995	\$706,930		\$177		17000 - 17999	10,854	\$1,080,820	3	\$100
							18000 - 18999	12,462	\$1,236,787	4	\$99
							19000 - 19999	7,776	\$774,023	2	\$100
							> 19999	49,718	\$4,953,665	15	\$100
							<b>PAYMENT TYPE</b>	333,624	\$68,600,118		\$206
							Regular	147	\$38,235		\$260
							Reissue	573	\$145,297		\$254
							Secondpay	409	\$63,362		\$155
							Underpay	257,826	\$18,065,857		\$70
							Extraordinary	592,579	\$86,912,869		\$147
							<b>TOTAL PMT</b>	126	\$24,513		\$195
							<b>RECOUPMENTS</b>	0	\$0		\$0
							<b>NET PAID</b>	592,579	\$86,912,869		\$147
							<b>PMT SUB TYPE</b>				
							APD				\$0
							STD				\$147

AVERAGE HOUSEHOLD SIZE: 2.32

\* Counts, Amounts (\$), % and AVG from HOUSING, RACE, DISABLED, OVER-60 and INCOME RANGE category are from Regular payments only

\*\* Counts, Amounts (\$), % and AVG from PAY\_TYPE category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

\*\*\* Counts, Amounts (\$), % and AVG from PAYMENT\_SENT category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

**HOME ENERGY CONSUMPTION EXPENDITURES**

**BY INCOME (PENNSYLVANIA)**

**May 2009**

***Prepared For:***

*Pennsylvania Utility Law Project (PULP)  
Harrisburg, Pennsylvania*

May 2009

**HOME ENERGY CONSUMPTION  
AND EXPENDITURES BY INCOME**  
(Pennsylvania)

**Prepared for:**

**Pennsylvania Utility Law Project (PULP)  
Harrisburg, PA  
Harry Geller, Executive Director**

***Prepared by:***

Roger D. Colton  
Fisher, Sheehan & Colton  
Public Finance and General Economics  
Belmont, Massachusetts

*“Dedicated to the power of concentrated expertise widely shared.”*

*May 2009*

One question that frequently presents itself today is the extent to which low-income households have higher or lower energy consumption than do higher income households. The question has numerous implications:

- Do rate designs with higher fixed costs help or harm low-income customers?
- Do energy efficiency investments adequately reach low-income customers?
- Do low-income customers have disproportionately high energy consumption that can be controlled through technology such as “smart meters,” prepayment meters, or service limiter adapters?

The analysis presented below examines energy usage and expenditures for Pennsylvania by income. The analysis focuses on three types of home energy use:

1. Natural gas used for space heating;
2. Electricity used for space heating;<sup>1</sup> and
3. Electricity used for non-space heating.<sup>2</sup>

Based on national, regional and state-specific data, the analysis below concludes that a direct relationship exists between income and home energy consumption. As income increases, home energy usage and expenditures increase as well.<sup>3</sup>

## I. PENNSYLVANIA-SPECIFIC DATA

While data produced by the U.S. Census Bureau setting forth home energy bills by income level for Pennsylvania does not contain usage data, per se, the data on expenditures nonetheless provides reasonable insights into the relative use of natural gas and electricity by income level.

Pennsylvania data is set forth in Table 1. This Table presents monthly expenditures for natural gas, electricity (space heating), and electricity (non-space heating) as reported in the 2007 American Community Survey, which provides the most recent Census data available.<sup>4</sup> As can be seen, expenditures for all three fuels (treating electricity used for space heating and electricity

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<sup>1</sup> “Electricity used for space heating” includes all electricity expenditures by households using electricity for space heating.

<sup>2</sup> “Electricity used for non-space heating” includes all electricity expenditures by households not using electricity for space heating. The data excludes households reporting the use of “no fuels.”

<sup>3</sup> Throughout this discussion, “home energy” refers respectively to the use of natural gas, the use of electricity by households using electricity for space heating, and the use of electricity by households using space heating fuels other than electricity.

<sup>4</sup> The American Community Survey collects annual data on selected household and housing characteristics in years between the Decennial Census.

used for non-space heating as a separate “fuel” for these purposes) increase as each income tier increases in Pennsylvania.

Monthly natural gas expenditures for households with incomes more than \$250,000 were nearly twice as high as the monthly expenditures for households with incomes less than \$10,000 (\$143.90 vs. \$78.00) in 2007 while the monthly electric space-heating expenditures were more than three times higher (\$241.50 vs. \$70.70). So, too, did the monthly expenditures for electric non-space heating for households at the highest income range exceed electric non-space heating expenditures at the lowest range by nearly 300% (\$195.20 vs. \$66.70).

Indeed, the median income in Pennsylvania in 2007 was \$48,576. For median income, we find:

- The monthly natural gas expenditure for the income range encompassing that median income (\$40,000 - \$50,000) was \$109.50, nearly 40% higher than expenditures for households with incomes less than \$10,000 (the lowest income level) (\$78.00), but only 74% of expenditures for households with income greater than \$250,000 (the highest income level) (\$143.90).
- The monthly electric space heating expenditure for the income range encompassing median income was \$126.30, nearly 80% higher than expenditures for households with income less than \$10,000 (\$70.70), but half of the expenditures by households with income greater than \$250,000 (\$241.50).
- The monthly electric non-space heating expenditures was \$92.30, nearly 40% higher than expenditures by households with income less than \$10,000 (\$66.70), but only half of the expenditures by households with income greater than \$250,000 (\$195.20).

Figure 1 presents the same data graphically. The graphic presentation of the data reveals in clear terms the continuous increase in home energy consumption as household income increases for all three fuels.

The conclusions reached above do not change if the income status of households is measured by reference to income in terms of a ratio to Federal Poverty Level (FPL) rather than in dollar terms. Poverty Level is a measure of income taking into account household size. Poverty Level recognizes, for example, that a three-person household with an income of \$10,000 is “poorer” than a two-person household with an income of \$10,000.

Overlaying household size onto income by considering the Federal Poverty Level of a household does not change the results of the inquiry in Pennsylvania. Table 2 presents monthly home energy bills for Pennsylvania by increasing levels of the Federal Poverty Level. In Pennsylvania, the monthly home energy expenditure at 300% of Poverty or more is:

- 144% of the natural gas expenditures for households with incomes below 50% of Federal Poverty Level;

- 177% of the electric space heating for households with incomes below 50% of Federal Poverty Level; and
- 139% of the electric non-space heating for households with incomes below 50% of Federal Poverty Level.

#### CONSISTENCY WITH NON-STATE-SPECIFIC DATA

Other empirical analysis supports this finding that a relationship exists between income and home energy expenditures. The U.S. Department of Energy, Energy Information Administration (“DOE/EIA”) publishes regular periodic reports based on data from its triennial Residential Energy Consumption Survey (“RECS”). In June 2001, DOE/EIA released its analysis of RECS data titled *Natural Gas Use in American Households*. In the section of its analysis that examines the relationship between income and natural gas usage, DOE/EIA states:

The use of natural gas for any end use and as the main heating fuel was approximately the same regardless of household income category. In contrast, natural gas consumption and expenditures per household did vary by household income—higher income households consumed more and spent more on average. Higher income households lived in larger housing units, which require more energy for heating.<sup>5</sup>

#### INCOME AND THE SIZE OF HOUSING UNITS

The Department of Energy’s observation that “higher income households live in larger housing units, which require more energy for heating” applies to Pennsylvania as well as to the country as a whole.

Table 3 presents Pennsylvania data on home energy expenditures by income and housing unit size. In Table 3, the size of the housing unit is measured in terms of the number of bedrooms. As can be seen from Table 3, the difference in the average expenditures by income is far greater than the difference in expenditures by income within any given housing unit size. This is because the distribution of households by housing unit size is not similar between income ranges<sup>6</sup>. While there may be somewhat of a distinction between a higher-income household in a four-bedroom housing unit and a lower-income household in a four-bedroom housing unit, because there are far fewer lower-income households in four-bedroom units, the overall difference in expenditures is much greater.

The same impacts can be seen in Table 4. This data also presents the distribution of home energy expenditures by housing unit size. In Table 4, housing unit size is measured in terms of the total number of rooms (not merely the number of bedrooms). The same relationship is

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<sup>5</sup> EIA/DOE, *Natural Gas Use in American Households*, Household Income, at text accompanying Figures 1 – 3 (June 2001).

<sup>6</sup> See, Table 5 and Table 6, *infra*, and accompanying text.

evident as was shown above. The average home energy expenditure in Pennsylvania varies sharply by income. As is the case with the number of bedrooms, the reason for this is that the higher-income households live in larger housing units.

### *Average Income and Housing Unit Size*

This conclusion that higher income Pennsylvania households live in larger housing units is based on two different data-based observations. First, Table 5 presents the average income in Pennsylvania by the number of *rooms* in a housing structure, as well as the average income in Pennsylvania by the number of *bedrooms* in a housing structure. Table 5 clearly shows that as average income increases, housing structures get larger in Pennsylvania.

There are two standard ways to measure the size of a housing unit. One way is to look at the number of total rooms. The other way is to look at the number of bedrooms. Both of these approaches document that smaller sized units have lower-income households. For example, while the average income of a Pennsylvania household living in a unit with one room is \$20,929, the average income of a household living in a unit with nine or more rooms is \$148,268.

The same relationship holds true for housing size measured by the number of bedrooms. While the average income for a Pennsylvania household living in a unit with one bedroom is \$31,285, the average income of a household living in a housing unit with five or more bedrooms is \$156,324.

Whether the size of the housing unit is measured in terms of the number of rooms, or in terms of the number of bedrooms, the average income progressively increases as the size of the housing unit increases.

### *Distribution of Housing Unit Size by Income*

The same results can be derived by examining the relationship between housing unit size (whether in terms of number of bedrooms or in terms of total number of rooms) and the income of households living in such units. Consider Table 6, which presents a distribution (rather than an average) of Pennsylvania households by the size of the housing unit in which they live, separately examining the size of the housing unit measured by the number of rooms and the number of bedrooms.

The data shows that a higher proportion of lower-income households live in smaller housing units. For example, while 48% of households with incomes less than \$10,000 live in units with two bedrooms or less, only 5% of households with income greater than \$250,000 (and only 6% of households with incomes between \$150,000 and \$250,000) live in units that small. Conversely, while 77% of households with incomes of \$250,000 or more live in units with four or more bedrooms (and 64% of households with incomes between \$150,000 and \$250,000 do), only 12% of households with incomes below \$10,000 live in units that large (and only 13% of households with incomes between \$10,000 and \$20,000 do).

The same observations can be made about the relationship of income and housing unit size measured in terms of the number of rooms (not merely number of bedrooms). While 80% of Pennsylvania households with incomes greater than \$250,000 live in housing units with eight or more rooms (and 66% of households with incomes between \$150,000 and \$250,000 do), only 9% of households with incomes less than \$10,000 do (identical to the 9% of households with incomes between \$10,000 and \$20,000 that do).

### ***Income and Building Type***

Others ways exist through which to gain insights into the relationship between housing unit size and income. One of the implications of housing unit size documented above is a difference in housing unit *type* as well. One extension of the observation that low-income households live in smaller housing units is the further observation that low-income households tend to live in smaller, denser housing units as well.

Examining the relationship between income and the type of building in which customers have their housing units helps to determine whether this is accurate for Pennsylvania. Building type is disaggregated by the type of construction (single family, multi-family, mobile home) and the number of units in each building.

Table 7 shows that residents of multi-family housing units are significantly disproportionately over-represented by low-income households. While 31% of households with incomes less than \$10,000 live in building units with three or more units, and 22% of households with incomes between \$10,000 and \$20,000 do, fewer than 3% of households with incomes of \$150,000 or more live in buildings with three or more units. Conversely, while between 86% and 90% of households with incomes \$150,000 or higher live in single family detached homes, only 29% of households with incomes less than \$10,000 do (and only 39% of households with incomes between \$10,000 and \$20,000 do).

This data supports the conclusion that low-income households have lower home energy consumption in two ways. Table 8 presents home energy expenditures data broken down by building type and income for Pennsylvania.

- Holding building *type* constant, it is possible to see the increase in natural gas expenditures as income increases. For example, in single family detached homes, natural gas expenditures increase from \$115.50 for households with incomes less than \$10,000 living in single-family detached homes to \$131.70 for households with incomes between \$150,000 and \$250,000 (and \$152.20 for households with incomes greater than \$250,000). The same relationship holds for electricity space-heating expenditures (\$173 to \$271.70) as well as for electricity non-space-heating expenditures (\$87.20 to \$214.70).
- Conversely, holding income constant, it is possible to see the decrease in natural gas expenditures as the type of building unit changes (with lower expenditures in buildings with multi-units). For households with income between \$20,000 and \$30,000, for example, natural gas expenditures decreased from \$125.40 in single-family detached

homes to \$29.90 in multi-family buildings with 50 or more units. Again, the same relationship holds for electricity space-heating (\$158.70 to \$42.70) and electricity for non-space heating (\$93.10 to \$36.50).

The conclusion can be drawn that comprehensive Pennsylvania-specific information shows two relationships. First, low-income households tend to live in smaller housing units. Second, smaller housing units tend to have lower home energy (natural gas, electric space-heating, electric non-space-heating) consumption. As a result, the home consumption of low-income households is, on average, lower than the home energy consumption of higher income households.

### **Federal Regional Data**

The relationships identified in the Pennsylvania-specific data are consistent with other regional data reported by the federal government. The U.S. Department of Labor (“DOL”) reports home energy expenditures by region by income. Pennsylvania is in the Northeast regional data reported by the Department of Labor’s Consumer Expenditures Survey (“CEX”).

Table 9 presents the CEX data for the past four years (2006-2007; 2005-2006; 2004-2005; 2003-2004). The CEX data corroborates the state-specific data on the relationship between natural gas and electricity consumption and income.

- In each of the 36 cells (but two: \$30,000 - \$39,999 for 2005/2006 and 2006/2007), the Northeast natural gas expenditures for the higher income tier was more than the natural gas expenditures for the immediately preceding lower-income tiers. Natural gas expenditures for the lowest income tiers (below \$10,000) were roughly one-third the residential average.
- Electricity shows an almost identical pattern. In each of the 36 cells but two (\$5,000 - \$9,999 for 2004/2005 and 2005/2006), the Northeast electricity expenditures for the higher income tier was more than the electricity expenditures for the immediately preceding lower-income tier. Electricity expenditures for the lowest income tier (below \$10,000) were roughly 40% of the residential average.

### **HOUSEHOLD BASIC NEEDS BUDGET**

The fact that lower-income households tend to squeeze all available savings out of their discretionary energy consumption is not surprising. Research shows that low-income households tend to be “good budgeters.” When household income does not provide sufficient resources to cover household necessities, low-income households tend to reduce their expenditures on those necessities.

In this respect, while the unaffordability of home energy in Pennsylvania is driven by the interaction of home energy bills and household income, the overall inadequacy of household income to cover the household’s basic family budget should be taken into account as well. A

basic family budget takes into account the entire range of household expenses, including housing, food, childcare, transportation, health care, necessities and taxes. To the extent that household income is insufficient to cover these basic expenditures, trade-offs must occur in what gets paid and what does not.<sup>7</sup>

A basic family budget varies based on both the household size and the household composition. Not only will a three-person family have a different budget than a two-person family, but also a one-parent/two-child three-person family will have a different basic family budget than a two-parent/one-child three-person family.

Table 10 summarizes the inadequacy of household incomes in Pennsylvania.<sup>8</sup> Basic family budgets<sup>9</sup> for four different family configurations were calculated, using different family composition and family size. Within the reported metropolitan areas for Pennsylvania (and a “rural” region), the basic family budget for a one-parent/one-child family ranged from a low of 227% of the Federal Poverty Level (Armstrong County) to a high of 296% of the Poverty Level (Philadelphia). Pennsylvania’s rural areas have a somewhat lower basic family budget than most, but not all, of the metropolitan regions (243% of Poverty Level).

Three-person families, whether configured as one-parent/two-child or two-parent/one-child families, were grouped more closely within the state, but still well-above 200% of Federal Poverty Level. A two-parent/one-child family has a somewhat lower basic family budget in Pennsylvania than a one-parent/two-child family.

Finally, while the absolute dollar amounts of the basic family budget for a two-parent/two-child family are higher than the corresponding budgets for smaller families, the ratio of those incomes to the Federal Poverty Level are lower. Two-parent/2-child families with income at 222% of Poverty Level in Erie and Williamsport along with families at 219% of the Poverty Level in Johnstown and 222% in Sharon are living with an income that would cover the basic family budget. In contrast, it would take these 2-parent/2-child families 246% of Poverty Level to meet their basic family budget in Allentown and 253% of Poverty Level to meet their basic family budget in Pike County.

The detailed calculations underlying this discussion of basic family needs budgets in Pennsylvania are set forth in Appendix A.

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<sup>7</sup> See, e.g., National Energy Assistance Directors Association (2003). 2003 Survey of Energy Assistance Recipients, Apprise, Inc: Princeton (NJ); National Energy Assistance Directors Association (2005). 2005 Survey of Energy Assistance Recipients, Apprise, Inc.: Princeton (NJ) (energy assistance recipients reduce expenditures on food, health care and other essentials in response to unaffordable home energy bills).

<sup>8</sup> These Basic Family Budgets are calculated by the Economic Policy Institute. They are available at EPI’s web site: [www.epi.org](http://www.epi.org).

<sup>9</sup> Unless the context otherwise clearly shows, a “family” and a “household” are considered to be synonymous for purposes of this discussion.

## **SUMMARY AND CONCLUSIONS**

The data showing a direct relationship between income and home energy consumption in Pennsylvania is compelling. The differences that are evident in the data are not small. Low-income customers have lower usage not only as compared to high-income customers, but also when compared to average customers as well. In addition, the national data is consistent. The national data developed by the U.S. DOE, the regional data developed by the U.S. DOL, and the state-specific data developed by the Census Bureau all find the same relationship. Finally, the data is internally consistent. While DOE reports that income is related to home energy usage because of differences in housing unit sizes, that relationship is confirmed when housing unit size is overlaid on income and home energy expenditures in the Pennsylvania using state-specific data.

## Data Tables

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Table 1.  
 Monthly Home Expenditures by Income (Pennsylvania)  
 2007 American Community Survey

	Natural Gas	Electric (Space Heating)	Electric (non-space heating)
\$1-\$10,000	\$78.00	\$70.70	\$66.70
\$10,001 - \$20,000	\$89.10	\$80.20	\$68.10
\$20,001 - \$30,000	\$102.60	\$99.60	\$78.70
\$30,001 - \$40,000	\$107.00	\$113.80	\$86.00
\$40,001 - \$50,000	\$109.50	\$126.30	\$92.30
\$50,001 - \$75,000	\$114.40	\$143.00	\$102.60
\$75,001 - \$150,000	\$117.50	\$171.50	\$121.10
\$150,001 - \$250,000	\$124.90	\$201.10	\$153.40
\$250,000 or more	\$143.90	\$241.50	\$195.20

**Figure 1. Monthly Home Energy Expenditures by Income  
 (Pennsylvania 2007)**

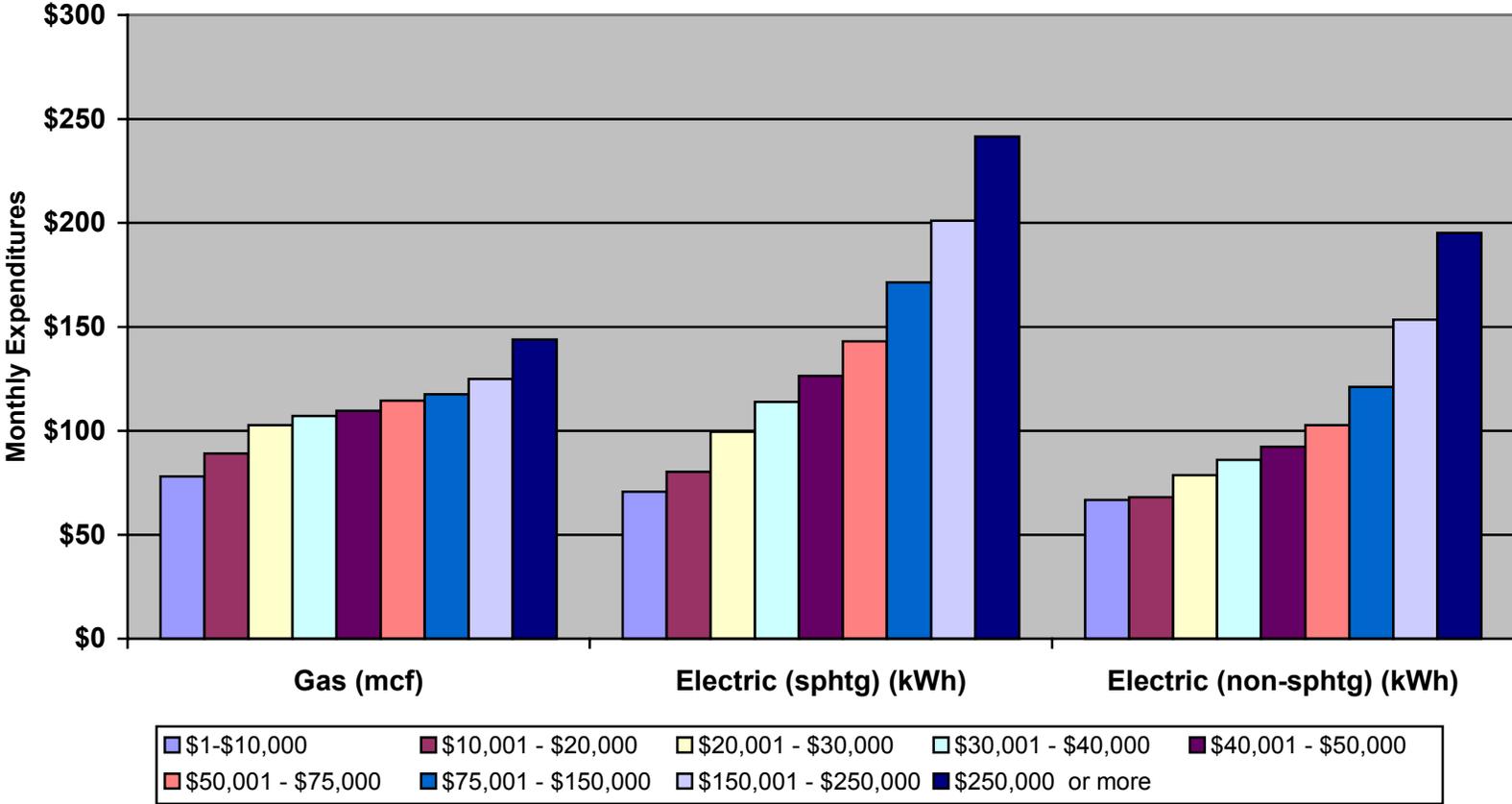


Table 2. Monthly Home Energy Expenditures by Ratio of Income to Federal Poverty Level (Pennsylvania)  
(American Community Survey: 2007)

	Natural Gas		Electric (space heating)		Electric (non-space heating)	
	Monthly Expenditures	Average Poverty Level within Range	Monthly Expenditures	Average Poverty Level within Range	Monthly Expenditures	Average Poverty Level within Range
1 - 50%	\$84.50	27.6%	\$99.00	27.1%	\$89.70	27.7%
51 - 100%	\$86.00	75.9%	\$102.40	76.1%	\$87.80	76.3%
101 - 150%	\$92.50	125.7%	\$116.50	125.8%	\$95.20	126.2%
151 - 200%	\$99.40	176.9%	\$122.20	174.6%	\$102.40	176.8%
201 - 300%	\$105.90	250.9%	\$141.70	251.1%	\$107.20	251.2%
301% or more	\$122.10	446.7%	\$175.60	450.3%	\$124.90	445.0%

Table 3a. Monthly Natural Gas Expenditures by Number of Bedrooms in Home and Income (Pennsylvania)  
(American Community Survey: 2007)

No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$18.30	\$11.70	\$103.90	\$51.10	\$105.60	---	\$173.40	---	---
1 bedroom	\$37.90	\$45.40	\$45.70	\$49.80	\$50.50	\$45.10	\$57.00	\$17.20	\$37.80
2 bedrooms	\$80.30	\$89.50	\$87.90	\$90.70	\$87.90	\$98.40	\$87.40	\$101.30	\$108.90
3 bedrooms	\$101.20	\$109.00	\$129.00	\$123.10	\$126.80	\$121.00	\$119.90	\$125.50	\$134.10
4 bedrooms	\$125.50	\$126.80	\$122.40	\$161.30	\$133.00	\$146.80	\$124.80	\$130.00	\$142.20
5+ bedrooms	\$85.00	\$129.10	\$118.70	\$166.40	\$167.00	\$162.20	\$172.40	\$151.30	\$166.10
Total	\$86.10	\$95.90	\$109.90	\$116.60	\$117.10	\$122.30	\$121.80	\$129.80	\$145.80

**Table 3b. Monthly Electric (space heating) Expenditures by Number of Bedrooms in Home and Income (Pennsylvania)  
(American Community Survey: 2007)**

No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$25.50	\$25.60	\$37.70	\$42.40	\$16.70	\$18.20	\$56.40	\$71.00	---
1 bedroom	\$50.00	\$47.00	\$57.40	\$60.00	\$83.50	\$87.00	\$94.30	\$85.20	\$157.30
2 bedrooms	\$88.70	\$93.90	\$105.70	\$112.10	\$115.40	\$115.90	\$124.90	\$138.40	\$153.80
3 bedrooms	\$126.80	\$139.70	\$148.80	\$156.70	\$150.40	\$171.00	\$185.20	\$194.30	\$191.20
4 bedrooms	\$171.30	\$171.40	\$157.90	\$181.00	\$191.70	\$187.70	\$206.40	\$231.70	\$274.80
5+ bedrooms	\$181.60	\$41.10	\$135.50	\$183.60	\$222.50	\$214.20	\$239.70	\$283.20	\$299.40
Total	\$86.60	\$91.60	\$111.50	\$130.10	\$139.50	\$157.20	\$183.80	\$214.80	\$256.50

**Table 3c. Monthly Electric (non-space heating) Expenditures by Number of Bedrooms in Home and Income (Pennsylvania)  
(American Community Survey: 2007)**

No. of BRms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
0 bedrooms	\$24.80	\$27.90	\$32.30	\$59.60	\$93.70	\$27.90	\$57.90	\$20.00	---
1 bedroom	\$41.30	\$51.40	\$53.60	\$58.50	\$61.50	\$67.60	\$76.90	\$111.20	\$75.90
2 bedrooms	\$63.70	\$68.90	\$72.50	\$75.90	\$82.20	\$88.00	\$97.60	\$111.00	\$113.20
3 bedrooms	\$88.70	\$84.60	\$95.70	\$102.50	\$103.00	\$109.10	\$119.90	\$139.60	\$151.20
4 bedrooms	\$104.90	\$90.50	\$113.80	\$113.30	\$120.00	\$137.40	\$147.00	\$177.50	\$214.20
5+ bedrooms	\$115.10	\$95.20	\$106.00	\$111.40	\$155.70	\$138.70	\$151.10	\$196.00	\$244.00
Total	\$77.20	\$76.60	\$88.70	\$96.30	\$102.90	\$112.50	\$129.00	\$165.60	\$207.20

Table 4a. Monthly Natural Gas Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)  
(American Community Survey: 2007)

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$9.70	\$9.60	\$36.10	\$8.90	\$105.60	---	---	---	---
2 room	\$25.90	\$22.80	\$46.30	\$32.10	\$78.90	\$31.30	\$13.50	\$1.00	\$24.80
3 room	\$33.90	\$52.60	\$42.20	\$51.00	\$56.10	\$60.70	\$54.10	\$41.30	\$52.90
4 room	\$71.40	\$74.50	\$76.50	\$75.90	\$72.00	\$78.70	\$73.60	\$98.40	\$45.60
5 room	\$83.20	\$87.30	\$103.80	\$100.80	\$96.50	\$105.50	\$103.80	\$106.70	\$151.40
6 room	\$100.50	\$117.70	\$131.90	\$127.10	\$135.20	\$122.20	\$120.10	\$129.60	\$117.40
7 room	\$118.10	\$126.30	\$119.20	\$128.60	\$126.90	\$125.40	\$125.80	\$111.40	\$138.00
8 room	\$118.90	\$124.10	\$135.00	\$146.70	\$131.90	\$148.00	\$120.70	\$125.70	\$133.50
9 or more	\$160.80	\$127.80	\$127.10	\$177.70	\$140.40	\$152.60	\$138.70	\$143.20	\$156.20
<b>Total</b>	<b>\$86.10</b>	<b>\$95.90</b>	<b>\$109.90</b>	<b>\$116.60</b>	<b>\$117.10</b>	<b>\$122.30</b>	<b>\$121.80</b>	<b>\$129.80</b>	<b>\$145.80</b>

Table 4b. Monthly Electric (space heating) Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)  
(American Community Survey: 2007)

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$25.30	\$25.90	\$38.50	\$42.40	\$16.70	\$16.90	\$250.00	\$57.60	---
2 room	\$29.40	\$45.70	\$35.60	\$53.60	\$67.40	\$77.90	\$97.00	\$90.00	\$80.00
3 room	\$69.80	\$49.30	\$69.90	\$61.20	\$79.20	\$95.40	\$91.70	\$90.70	\$69.90
4 room	\$70.70	\$83.90	\$88.50	\$90.20	\$111.60	\$108.50	\$120.50	\$122.70	\$93.50
5 room	\$83.50	\$121.00	\$128.30	\$148.10	\$138.00	\$142.20	\$149.10	\$156.50	\$200.80
6 room	\$156.00	\$141.00	\$151.20	\$150.40	\$163.40	\$161.00	\$172.50	\$226.50	\$171.40
7 room	\$148.30	\$143.20	\$163.80	\$185.70	\$143.50	\$183.80	\$195.80	\$196.40	\$228.00
8 room	\$165.70	\$166.40	\$177.70	\$151.80	\$194.10	\$193.50	\$201.50	\$218.60	\$245.40
9 or more	\$208.00	\$187.50	\$126.30	\$206.40	\$145.10	\$188.40	\$220.80	\$251.00	\$288.40
<b>Total</b>	<b>\$86.60</b>	<b>\$91.60</b>	<b>\$111.50</b>	<b>\$130.10</b>	<b>\$139.50</b>	<b>\$157.20</b>	<b>\$183.80</b>	<b>\$214.80</b>	<b>\$256.50</b>

Table 4c. Monthly Electric (non-space heating) Expenditures by Number of Rooms in Home and Annual Income (Pennsylvania)  
(American Community Survey: 2007)

No. of Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000+
1 room	\$13.10	\$29.50	\$30.50	\$13.80	\$57.30	\$17.50	\$30.00	\$20.00	---
2 room	\$37.30	\$53.90	\$55.10	\$53.20	\$52.80	\$70.10	\$51.80	\$201.00	\$83.00
3 room	\$40.20	\$52.40	\$51.90	\$58.90	\$67.20	\$74.10	\$91.00	\$71.70	\$44.70
4 room	\$60.40	\$68.50	\$69.90	\$72.60	\$81.20	\$91.50	\$90.20	\$82.00	\$104.90
5 room	\$73.60	\$71.30	\$78.50	\$87.10	\$92.60	\$102.60	\$109.10	\$117.20	\$130.80
6 room	\$90.20	\$85.80	\$96.60	\$99.70	\$96.10	\$105.30	\$116.00	\$129.30	\$132.10
7 room	\$98.70	\$80.40	\$98.30	\$104.60	\$109.30	\$117.70	\$126.30	\$155.40	\$173.70
8 room	\$110.30	\$101.10	\$108.10	\$120.10	\$130.00	\$122.50	\$137.30	\$157.70	\$179.60
9 or more	\$115.50	\$100.40	\$125.30	\$115.60	\$136.20	\$141.40	\$154.20	\$191.60	\$233.30
<b>Total</b>	<b>\$77.20</b>	<b>\$76.60</b>	<b>\$88.70</b>	<b>\$96.30</b>	<b>\$102.90</b>	<b>\$112.50</b>	<b>\$129.00</b>	<b>\$165.60</b>	<b>\$207.20</b>

Table 5. Average Income by Number of Rooms or Bedrooms in Housing Unit (Pennsylvania)  
(American Community Survey: 2007)

Number of Rooms/Bedrooms	Average Income by Number of Rooms/Bedrooms	
	Rooms	Bedrooms
0	xxx	\$25,286
1	\$20,929	\$31,285
2	\$30,377	\$50,919
3	\$36,671	\$72,878
4	\$42,454	\$120,742
5 /a/	\$56,074	\$156,324
6	\$68,710	
7	\$85,791	
8	\$108,054	
9 /b/	\$148,268	
Total	\$74,925	

NOTES:

/a/ For bedrooms, data is reported for 5 or more.  
/b/ For rooms, data is reported for 9 or more.

Table 6. Distribution of Pennsylvania Housing Units by Income and Housing Unit Size (Bedrooms and Rooms)  
(American Community Survey: 2007)

Bedrooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
No bedroom	3%	1%	1%	0%	0%	0%	0%	0%	0%
1 Bedroom	18%	16%	10%	6%	5%	3%	1%	1%	1%
2 Bedrooms	27%	30%	29%	25%	22%	17%	9%	5%	4%
3 Bedrooms	40%	40%	46%	50%	52%	54%	50%	30%	19%
4 Bedrooms	8%	10%	11%	14%	17%	20%	33%	48%	48%
5 or more bedrooms	4%	3%	3%	4%	5%	5%	7%	16%	29%
Total BDS	100%	100%	100%	100%	100%	100%	100%	100%	100%

Rooms	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
1 Room	2%	1%	0%	0%	0%	0%	0%	0%	0%
2 Rooms	4%	3%	2%	1%	1%	0%	0%	0%	0%
3 Rooms	13%	11%	7%	4%	3%	2%	1%	1%	0%
4 Rooms	20%	18%	16%	13%	11%	7%	3%	1%	1%
5 Rooms	19%	24%	21%	21%	20%	16%	10%	5%	4%
6 Rooms	20%	25%	27%	29%	28%	28%	22%	11%	6%
7 Rooms	11%	10%	14%	15%	17%	21%	23%	16%	8%
8 Rooms	4%	5%	7%	9%	11%	14%	20%	24%	17%
9 Or More Rooms	5%	4%	5%	7%	8%	11%	20%	42%	63%
Total RMS	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 7. Percentage of Households by Housing Unit Type (Pennsylvania) (American Community Survey: 2007)

Building Type	\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000	\$250,000 or more
Mobile home	6%	7%	7%	6%	5%	3%	1%	1%	0%
1-family detached	29%	39%	49%	56%	61%	68%	78%	86%	90%
1-family attached	28%	23%	22%	20%	21%	19%	16%	10%	7%
2 apartments	7%	8%	6%	5%	4%	3%	1%	0%	0%
3 – 4 units	8%	6%	5%	4%	3%	2%	1%	0%	1%
5 – 9 units	7%	5%	4%	3%	2%	2%	1%	1%	0%
10 – 19 units	5%	3%	3%	2%	2%	1%	1%	1%	0%
20 – 49 units	4%	3%	2%	1%	1%	1%	0%	0%	0%
50 or more units	7%	5%	2%	2%	1%	1%	1%	1%	1%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 8. Home Energy Bills by Income and Housing Type (Pennsylvania)  
(American Community Survey 2007)

	Building Type	Income								\$150- \$250,000	\$250,000 or more
		\$1 - \$10,000	\$10 - \$20,000	\$20 - \$30,000	\$30 - \$40,000	\$40 - \$50,000	\$50 - \$75,000	\$75 - \$150,000	\$150- \$250,000		
Natural Gas Bill	Mobile home	\$73.70	\$94.50	\$94.90	\$87.20	\$87.10	\$89.50	\$96.70	\$170.00	\$200.00	
	1-family detached	\$115.50	\$118.50	\$125.40	\$129.80	\$132.00	\$132.40	\$126.20	\$131.70	\$152.20	
	1-family attached	\$102.00	\$111.90	\$128.40	\$127.70	\$114.60	\$123.10	\$117.00	\$127.90	\$102.90	
	2 apartments	\$76.30	\$88.80	\$73.90	\$109.00	\$99.90	\$103.50	\$136.90	\$89.10	\$67.30	
	3 - 4 units	\$59.70	\$51.30	\$64.80	\$52.90	\$70.70	\$68.00	\$121.60	\$117.90	\$31.90	
	5 - 9 units	\$38.10	\$26.70	\$46.40	\$45.50	\$34.00	\$46.70	\$43.40	\$50.20	\$32.40	
	10 - 19 units	\$17.70	\$32.40	\$36.10	\$34.40	\$42.30	\$39.10	\$32.40	\$31.70	\$60.00	
	20 - 49 units	\$15.40	\$17.20	\$29.30	\$34.20	\$15.90	\$16.70	\$36.80	\$66.30	\$8.90	
	50 or more units	\$13.70	\$3.30	\$29.90	\$17.00	\$12.20	\$24.20	\$23.80	\$21.00	\$2.30	
	Total	\$86.10	\$95.90	\$109.90	\$116.60	\$117.10	\$122.30	\$121.80	\$129.80	\$145.80	
Electric (space heating) Bill	Mobile home	\$147.10	\$135.70	\$123.50	\$135.80	\$121.20	\$184.20	\$154.10	\$175.80	\$80.00	
	1-family detached	\$173.00	\$160.30	\$158.70	\$172.30	\$173.50	\$179.40	\$196.40	\$228.20	\$271.70	
	1-family attached	\$103.40	\$113.90	\$112.60	\$141.10	\$122.60	\$142.80	\$173.00	\$194.80	\$183.60	
	2 apartments	\$68.50	\$89.50	\$86.80	\$91.60	\$120.00	\$127.30	\$109.20	\$160.00	---	
	3 - 4 units	\$77.00	\$86.30	\$95.30	\$116.10	\$113.10	\$124.60	\$110.70	\$215.30	\$267.20	
	5 - 9 units	\$75.30	\$68.90	\$87.70	\$81.80	\$99.50	\$102.60	\$135.70	\$112.60	\$180.00	
	10 - 19 units	\$102.30	\$62.50	\$74.80	\$82.00	\$70.90	\$96.70	\$120.80	\$139.20	---	
	20 - 49 units	\$43.30	\$43.20	\$37.70	\$54.00	\$60.10	\$84.10	\$114.40	\$48.50	\$270.00	
	50 or more units	\$30.70	\$26.40	\$42.70	\$39.90	\$66.50	\$73.70	\$79.20	\$107.20	\$90.80	
	Total	\$86.60	\$91.60	\$111.50	\$130.10	\$139.50	\$157.20	\$183.80	\$214.80	\$256.50	
Electric (non-space heating) Bill	Mobile home	\$85.60	\$79.10	\$83.40	\$95.90	\$100.50	\$108.80	\$106.40	\$101.20	\$83.20	
	1-family detached	\$87.20	\$81.20	\$93.10	\$97.60	\$105.60	\$114.40	\$132.80	\$168.70	\$214.70	
	1-family attached	\$98.10	\$88.80	\$102.90	\$110.70	\$110.40	\$118.90	\$123.60	\$158.90	\$132.30	
	2 apartments	\$59.20	\$74.10	\$68.50	\$84.50	\$84.40	\$93.70	\$110.00	\$100.30	\$86.00	
	3 - 4 units	\$44.00	\$50.80	\$57.90	\$64.70	\$60.60	\$81.30	\$75.50	\$105.30	\$134.10	
	5 - 9 units	\$38.00	\$40.10	\$56.10	\$59.50	\$69.70	\$71.10	\$65.50	\$54.30	\$96.70	
	10 - 19 units	\$34.90	\$45.40	\$48.60	\$67.50	\$55.60	\$73.10	\$76.10	\$55.90	\$60.00	
	20 - 49 units	\$31.30	\$55.20	\$45.50	\$47.30	\$64.10	\$69.00	\$67.90	\$104.90	\$150.00	
	50 or more units	\$17.10	\$30.50	\$36.50	\$39.10	\$53.80	\$51.50	\$52.70	\$40.50	\$93.90	
	Total	\$77.20	\$76.60	\$88.70	\$96.30	\$102.90	\$112.50	\$129.00	\$165.60	\$207.20	

Table 9. Home Energy Expenditures by Household Income Before Taxes (Northeast)

	Total	Less than \$5,000	\$5,000 - \$9,999	\$10,000 - \$14,999	\$15,000 - \$19,999	\$20,000 - \$29,999	\$30,000 - \$39,999	\$40,000 - \$49,999	\$50,000 - \$69,999	\$70,000 or more
Natural Gas										
2006 - 2007	\$656	\$217	\$291	\$386	\$554	\$510	\$535	\$647	\$732	\$888
2005 - 2006	\$640	\$278	\$319	\$370	\$576	\$533	\$596	\$645	\$723	\$823
2004 - 2005	\$596	\$242	\$304	\$347	\$522	\$535	\$568	\$602	\$620	\$783
2003 - 2004	\$540	\$167	\$290	\$344	\$478	\$508	\$522	\$549	\$536	\$726
Electricity										
2006 - 2007	\$1,225	\$467	\$491	\$721	\$820	\$924	\$1,096	\$1,144	\$1,264	\$1,742
2005 - 2006	\$1,139	\$521	\$518	\$662	\$778	\$875	\$968	\$1,101	\$1,221	\$1,623
2004 - 2005	\$1,043	\$479	\$473	\$638	\$683	\$821	\$862	\$1,023	\$1,165	\$1,473
2003 - 2004	\$954	\$360	\$457	\$602	\$676	\$749	\$845	\$948	\$1,092	\$1,341

SOURCE: Table 31, U.S. Department of Labor, Consumer Expenditures Survey (annual)

*Table 10: Basic Family Budget  
in Dollars and Percentage of Federal Poverty Level by Geographic Area  
(Pennsylvania)*

	1 parent/1 child		1 parent/2 children		2 parents/1 child		2 parents/2 children	
	Dollars	FPL /a/	Dollars	FPL	Dollars	FPL	Dollars	FPL
Allentown-Bethlehem-Easton	\$37,124	271%	\$44,992	262%	\$43,198	252%	\$50,697	246%
Altoona	\$32,090	234%	\$40,228	234%	\$38,225	223%	\$45,839	222%
Armstrong County	\$31,027	227%	\$39,419	230%	\$37,420	218%	\$45,016	218%
Erie	\$32,462	237%	\$40,521	236%	\$38,190	222%	\$45,804	222%
Harrisburg-Carlisle	\$35,182	257%	\$42,997	250%	\$41,303	241%	\$48,801	236%
Johnstown	\$31,187	228%	\$39,580	231%	\$37,571	219%	\$45,200	219%
Lancaster	\$34,388	251%	\$42,200	246%	\$39,837	232%	\$47,380	229%
Lebanon	\$34,014	248%	\$41,974	244%	\$39,910	232%	\$47,551	230%
Philadelphia-Camden-Wilmington	\$40,561	296%	\$48,804	284%	\$46,616	271%	\$54,488	264%
Pike County	\$39,132	286%	\$46,899	273%	\$44,866	261%	\$52,267	253%
Pittsburgh	\$33,901	248%	\$41,818	244%	\$39,815	232%	\$47,412	230%
Reading	\$34,735	254%	\$42,631	248%	\$40,242	234%	\$47,867	232%
Rural	\$33,279	243%	\$40,554	236%	\$39,489	230%	\$46,452	225%
Scranton--Wilkes-Barre	\$33,990	248%	\$42,042	245%	\$40,260	234%	\$47,992	232%
Sharon	\$32,038	234%	\$40,167	234%	\$38,166	222%	\$45,761	222%
State College	\$36,994	270%	\$44,943	262%	\$42,830	249%	\$50,408	244%
Williamsport	\$32,141	235%	\$40,248	234%	\$38,249	223%	\$45,841	222%
York-Hanover	\$34,347	251%	\$42,160	246%	\$39,795	232%	\$47,339	229%

NOTES:

/a/ FPL is the ratio of the basic family budget to 100% of the Federal Poverty Level for the particular household size. 100% of Federal Poverty Level in 2007 for a two-person household was \$13,690; for a three-person household was \$17,170; and for a four-person household was \$20,650. Basic family needs budgets were calculated for 2007.

/b/ Pennsylvania portions of multi-state metropolitan areas.

SOURCE: Economic Policy Institute, Basic Family Budget Calculator.

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## Appendix A

(These Basic Family Budgets are developed through the Basic Family Budget Calculator produced by the Economic Policy Institute, [http://www.epi.org/content/budget\\_calculator](http://www.epi.org/content/budget_calculator).)

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Appendix A.1: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition  
(1 parent/1 child)

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$317	\$709	\$339	\$210	\$272	\$430	\$3,094	\$37,124
Altoona	\$581	\$317	\$709	\$343	\$210	\$216	\$298	\$2,674	\$32,090
Armstrong County Metro FMR area	\$546	\$317	\$709	\$343	\$210	\$208	\$253	\$2,586	\$31,027
Erie	\$631	\$317	\$709	\$298	\$210	\$228	\$311	\$2,705	\$32,462
Harrisburg—Carlisle	\$722	\$317	\$709	\$339	\$210	\$250	\$385	\$2,932	\$35,182
Johnstown	\$546	\$317	\$709	\$343	\$210	\$208	\$266	\$2,599	\$31,187
Lancaster	\$715	\$317	\$709	\$298	\$210	\$248	\$368	\$2,866	\$34,388
Lebanon	\$643	\$317	\$709	\$343	\$210	\$231	\$382	\$2,834	\$34,014
Philadelphia-Camden-Wilmington	\$932	\$317	\$709	\$277	\$210	\$300	\$634	\$3,380	\$40,561
Pike County	\$923	\$317	\$709	\$343	\$210	\$298	\$461	\$3,261	\$39,132
Pittsburgh	\$666	\$317	\$709	\$318	\$210	\$236	\$368	\$2,825	\$33,901
Reading	\$715	\$317	\$709	\$298	\$210	\$248	\$396	\$2,895	\$34,735
Rural	\$598	\$317	\$691	\$390	\$222	\$220	\$335	\$2,773	\$33,279
Scranton--Wilkes-Barre	\$627	\$317	\$709	\$339	\$210	\$227	\$403	\$2,833	\$33,990
Sharon	\$583	\$317	\$709	\$343	\$210	\$216	\$291	\$2,670	\$32,038
State College	\$788	\$317	\$709	\$343	\$210	\$266	\$450	\$3,083	\$36,994
Williamsport	\$587	\$317	\$709	\$343	\$210	\$217	\$295	\$2,678	\$32,141
York--Hanover	\$713	\$317	\$709	\$298	\$210	\$248	\$367	\$2,862	\$34,347

Appendix A.2: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition  
(1 parent/2 children)

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$465	\$1,096	\$339	\$289	\$308	\$437	\$3,749	\$44,992
Altoona	\$581	\$465	\$1,096	\$343	\$289	\$251	\$328	\$3,352	\$40,228
Armstrong County Metro FMR area	\$546	\$465	\$1,096	\$343	\$289	\$243	\$304	\$3,285	\$39,419
Erie	\$631	\$465	\$1,096	\$298	\$289	\$263	\$334	\$3,377	\$40,521
Harrisburg—Carlisle	\$722	\$465	\$1,096	\$339	\$289	\$285	\$387	\$3,583	\$42,997
Johnstown	\$546	\$465	\$1,096	\$343	\$289	\$243	\$317	\$3,298	\$39,580
Lancaster	\$715	\$465	\$1,096	\$298	\$289	\$284	\$370	\$3,517	\$42,200
Lebanon	\$643	\$465	\$1,096	\$343	\$289	\$266	\$396	\$3,498	\$41,974
Philadelphia-Camden-Wilmington	\$932	\$465	\$1,096	\$277	\$289	\$336	\$672	\$4,067	\$48,804
Pike County	\$923	\$465	\$1,096	\$343	\$289	\$334	\$459	\$3,908	\$46,899
Pittsburgh	\$666	\$465	\$1,096	\$318	\$289	\$272	\$379	\$3,485	\$41,818
Reading	\$715	\$465	\$1,096	\$298	\$289	\$284	\$406	\$3,553	\$42,631
Rural	\$598	\$465	\$1,040	\$390	\$303	\$255	\$328	\$3,379	\$40,554
Scranton--Wilkes-Barre	\$627	\$465	\$1,096	\$339	\$289	\$262	\$426	\$3,503	\$42,042
Sharon	\$583	\$465	\$1,096	\$343	\$289	\$252	\$320	\$3,347	\$40,167
State College	\$788	\$465	\$1,096	\$343	\$289	\$301	\$464	\$3,745	\$44,943
Williamsport	\$587	\$465	\$1,096	\$343	\$289	\$253	\$322	\$3,354	\$40,248
York--Hanover	\$713	\$465	\$1,096	\$298	\$289	\$283	\$369	\$3,513	\$42,160

Appendix A.3: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition  
(2 parent/1 child)

	Housing	Food	Childcare	Transportation	Monthly Healthcare	Other Necessities	Taxes	Total	Annual Total
Allentown-Bethlehem-Easton FMR area	\$816	\$514	\$709	\$482	\$286	\$320	\$473	\$3,600	\$43,198
Altoona	\$581	\$514	\$709	\$468	\$286	\$263	\$365	\$3,185	\$38,225
Armstrong County Metro FMR area	\$546	\$514	\$709	\$468	\$286	\$255	\$341	\$3,118	\$37,420
Erie	\$631	\$514	\$709	\$404	\$286	\$275	\$364	\$3,182	\$38,190
Harrisburg—Carlisle	\$722	\$514	\$709	\$482	\$286	\$297	\$432	\$3,442	\$41,303
Johnstown	\$546	\$514	\$709	\$468	\$286	\$255	\$354	\$3,131	\$37,571
Lancaster	\$715	\$514	\$709	\$404	\$286	\$295	\$397	\$3,320	\$39,837
Lebanon	\$643	\$514	\$709	\$468	\$286	\$278	\$428	\$3,326	\$39,910
Philadelphia-Camden-Wilmington	\$932	\$514	\$709	\$401	\$286	\$347	\$696	\$3,885	\$46,616
Pike County	\$923	\$514	\$709	\$468	\$286	\$345	\$494	\$3,739	\$44,866
Pittsburgh	\$666	\$514	\$709	\$447	\$286	\$284	\$413	\$3,318	\$39,815
Reading	\$715	\$514	\$709	\$404	\$286	\$295	\$431	\$3,354	\$40,242
Rural	\$598	\$514	\$691	\$524	\$308	\$267	\$389	\$3,291	\$39,489
Scranton--Wilkes-Barre	\$627	\$514	\$709	\$482	\$286	\$274	\$463	\$3,355	\$40,260
Sharon	\$583	\$514	\$709	\$468	\$286	\$264	\$357	\$3,181	\$38,166
State College	\$788	\$514	\$709	\$468	\$286	\$313	\$492	\$3,569	\$42,830
Williamsport	\$587	\$514	\$709	\$468	\$286	\$265	\$359	\$3,187	\$38,249
York--Hanover	\$713	\$514	\$709	\$404	\$286	\$295	\$396	\$3,316	\$39,795

**Appendix A.4: Basic Family Budgets in Pennsylvania by Locale, Family Size and Family Composition  
(2 parent/2 children)**

	Housing	Food	Childcare	Transportation	Monthly			Total	Annual Total
					Healthcare	Other Necessities	Taxes		
Allentown-Bethlehem-Easton FMR area	\$816	\$643	\$1,096	\$482	\$364	\$351	\$472	\$4,225	\$50,697
Altoona	\$581	\$643	\$1,096	\$468	\$364	\$294	\$373	\$3,820	\$45,839
Armstrong County Metro FMR area	\$546	\$643	\$1,096	\$468	\$364	\$286	\$348	\$3,751	\$45,016
Erie	\$631	\$643	\$1,096	\$404	\$364	\$306	\$372	\$3,817	\$45,804
Harrisburg—Carlisle	\$722	\$643	\$1,096	\$482	\$364	\$328	\$431	\$4,067	\$48,801
Johnstown	\$546	\$643	\$1,096	\$468	\$364	\$286	\$363	\$3,767	\$45,200
Lancaster	\$715	\$643	\$1,096	\$404	\$364	\$327	\$400	\$3,948	\$47,380
Lebanon	\$643	\$643	\$1,096	\$468	\$364	\$309	\$439	\$3,963	\$47,551
Philadelphia-Camden-Wilmington	\$932	\$643	\$1,096	\$401	\$364	\$379	\$726	\$4,541	\$54,488
Pike County	\$923	\$643	\$1,096	\$468	\$364	\$377	\$485	\$4,356	\$52,267
Pittsburgh	\$666	\$643	\$1,096	\$447	\$364	\$315	\$420	\$3,951	\$47,412
Reading	\$715	\$643	\$1,096	\$404	\$364	\$327	\$440	\$3,989	\$47,867
Rural	\$598	\$643	\$1,040	\$524	\$388	\$298	\$379	\$3,871	\$46,452
Scranton--Wilkes-Barre	\$627	\$643	\$1,096	\$482	\$364	\$305	\$481	\$3,999	\$47,992
Sharon	\$583	\$643	\$1,096	\$468	\$364	\$295	\$364	\$3,813	\$45,761
State College	\$788	\$643	\$1,096	\$468	\$364	\$344	\$497	\$4,201	\$50,408
Williamsport	\$587	\$643	\$1,096	\$468	\$364	\$296	\$366	\$3,820	\$45,841
York--Hanover	\$713	\$643	\$1,096	\$404	\$364	\$326	\$399	\$3,945	\$47,339