

| | UGI Utilities Response First Year 2022 | UGI Utilities Response First Year 2023 | UGI Utilities Response First Year 2023 |
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| PA02-2003.3. Revenue and gas rates for (1) residential, (2) commercial, (3) industrial customers, and (4) transportation services only | | | |
| 1. The entity shall disclose its average bundled gas rate per million British thermal units (MMBtu) of bundled gas delivered to retail customers. | The average bundled gas rate for retail customers is \$14.24 per MMBtu. | The average bundled gas rate for retail customers is \$10.83 per MMBtu. | The average bundled gas rate for retail customers is \$9.52 per MMBtu. |
| 1.1 Bundled gas is defined as gas delivered to retail customers where the entity provides all services to the customer from procurement to retail distribution, including but not limited to, transmission, storage, distribution, and retail services (customers that receive such services may be referred to as cash customers). | | | |
| 1.2 The entity shall calculate its average bundled retail gas rate as the total revenue directly resulting from bundled gas delivered to retail customers divided by the amount of gas delivered (in MMBtu). | | | |
| 2. The entity shall disclose its average retail gas rate separately for each type of customer, where customers are classified as (1) residential, (2) commercial, and (3) industrial. | The average retail gas rate per MMBtu is as follows: Residential + \$11.82 Commercial + \$12.49 Industrial + \$11.99 | The average retail gas rate per MMBtu is as follows: Residential + \$11.82 Commercial + \$9.20 Industrial + \$8.72 | The average retail gas rate per MMBtu is as follows: Residential + \$10.31 Commercial + \$8.17 Industrial + \$7.71 |
| 2.1 The scope of each customer type shall be consistent with the entity's financial reporting. | | | |
| 2.2 Each customer type shall be disclosed as an aggregate for all customers within that respective customer type. | | | |
| 2.3 If the entity's financial reporting combines commercial and industrial customers into one category, then the entity may combine the commercial and industrial customer types. | | | |
| 2.4 The entity may disclose sub-classifications of customer types. For example, in addition to the average bundled rates for commercial customers, the entity may provide further disclosures by small commercial, large commercial, commercial/industrial, and/or other categories. | | | |
| 3. The entity shall disclose its average gas rate for (4) transportation services only per MMBtu of gas delivered to retail customers. | The average gas rate for transportation services only is \$1.92 | The average gas rate for transportation services only is \$1.89 | The average gas rate for transportation services only is \$1.76 |
| 3.1 Transportation services only is defined as gas moved through the entity's system for a fee for the benefit of an outside supplier selling to a customer inside the entity's distribution grid (customers that receive such services may be considered to be participating in customer choice programs, as described in Natural Gas Customer Choice Programs, by the U.S. Energy Information Administration). | | | |
| 3.2 The entity shall calculate its average gas rate for transportation services only as the total revenue directly resulting from gas transportation services only, provided to retail customers divided by the corresponding amount of gas delivered (in MMBtu). | | | |
| 4. The entity may disclose additional customer types if such customer types exist that do not fall within the scope of the customer types described above. | | | |
| PA02-2003.4. Typical monthly gas bill for residential customers for (1) 50 MMBtu, (2) 100 MMBtu, and (3) 150 MMBtu of gas delivered per year | | | |
| 1. The entity shall disclose the typical monthly gas bill for (1) 50 MMBtu, (2) 100 MMBtu, and (3) 150 MMBtu of gas delivered per year. | The typical monthly gas bill for residential customers for 50 MMBtu of gas delivered per year is \$70.45 | The typical monthly gas bill for residential customers for 50 MMBtu of gas delivered per year is \$55.09 | The typical monthly gas bill for residential customers for 50 MMBtu of gas delivered per year is \$48.70 |
| 1.1 Bundled gas is defined as gas delivered to retail customers where the entity provides all services to the customer from procurement to retail distribution, including but not limited to, transmission, storage, distribution, and retail services (customers that receive such services may be referred to as cash customers). | The typical monthly gas bill for residential customers for 100 MMBtu of gas delivered per year is \$125.23 | The typical monthly gas bill for residential customers for 100 MMBtu of gas delivered per year is 239.38 | The typical monthly gas bill for residential customers for 100 MMBtu of gas delivered per year is \$83.48 |
| 1.2 The entity shall calculate the typical monthly gas bill for residential customers as the sum of revenue directly resulting from bundled gas delivered to residential customers over the course of the reporting period, divided by the number of months in the reporting period, divided by the bundled average residential customer gas usage (in MMBtu). | | | |
| 1.3 Revenue shall be based on an assumption of (1) 30 MMBtu, and separately, (2) 100 MMBtu, of bundled gas delivered to residential customers per year. | | | |
| 1.4 Revenue shall be calculated using seasonal rates and an appropriate methodology for determining seasonal rate delivery patterns. | | | |
| 1.5 The entity shall disclose its methodology for calculating typical monthly gas bill for residential customers. | | | |
| 2. The entity may disclose additional customer types and/or sub-classifications of customer types. For example, the entity may additionally disclose typical monthly gas bill for commercial customers. | The typical monthly gas bill for Commercial customers using 434.4 MMBtu of gas delivered per year is \$454.39 | The typical monthly gas bill for Commercial customers using 410.6 MMBtu of gas delivered per year is \$314.69 | The typical monthly gas bill for Commercial customers using 400.7 MMBtu of gas delivered per year is \$279.89 |
| | The typical monthly gas bill for industrial customers using 1,784.4 MMBtu of gas delivered per year is \$724.88 | The typical monthly gas bill for industrial customers using 1,631.0 MMBtu of gas delivered per year is \$418.98 | The typical monthly gas bill for industrial customers using 1,613.1 MMBtu of gas delivered per year is \$410.61 |
| PA02-2003.5. Number of residential customer gas disconnections for non-payment, permitted reconnection within 30 days | | | |
| 1. The entity shall disclose the total number of gas disconnections among residential customers during the reporting period that resulted from non-payment, where: | 26,258 | 20,577 | 5,489 |
| 1.1 Disconnection is defined as the entity, or its service provider, intentionally turning off a customer's access to gas. | | | |
| 1.2 Disconnections occurring for multiple reasons shall be included in non-payment (or under-payment) as contributing cause of the disconnection. | | | |
| 2. The entity shall disclose the percentage of disconnections that are reconnected within 30 days. | 58.39% | 62.37% | 59.46% |
| 2.1 The percentage shall be calculated as the number of residential customers previously disconnected that were reconnected within 30 days of the date of the disconnection, divided by the total number of residential customer disconnections during the reporting period that resulted from non-payment. | | | |
| 2.2 A reconnection is defined as the entity, or its service provider, intentionally turning on a customer's access to gas, which was previously disconnected. | | | |
| 2.3 A reconnection may occur for reasons including, but not limited to, bill payment, the establishment of a bill payment plan, and/or the use of a bill assistance program. | | | |
| 2.4 The scope of disconnection may include reconnections that occur after the end of the reporting period, but the entity shall not double-count disconnections across multiple reporting periods. | | | |
| Note to PA02-2003.5 | | | |
| 1. The entity shall discuss how policies, programs, and regulations impact the number and duration of residential customer disconnections. | The Company follows the Utility regulations detailed in both PA CH 56 and COMAR. Both sets of regulations require UGI Utilities to cease termination of residential, low-income accounts. In Pennsylvania, this moratorium period begins December 1st and ends March 31st each year. In Maryland, COMAR requires utilities to cease terminations one month earlier, effective November 1st. While the Company does have a process to continue to work in arrears, non-low-income, residential and commercial accounts during the moratorium, the amount of effort and therefore driver prices limit the amount of work that gets completed during these periods. | The Company follows the Utility regulations detailed in both the PA CH 56 and COMAR regulations. Both sets of regulations require UGI Utilities to have a winter moratorium on low income terminations. The moratorium in PA begins December 1st and ends March 31st each year. COMAR requires utilities to cease terminations one month earlier effective November 1st. While the Company does have a manual process to continue to work in arrears, non-low-income, residential and commercial accounts during the moratorium, other temperature driver prices limit the amount of work that gets completed during these periods. | The Company follows the Utility regulations detailed in both the PA CH 56 and COMAR regulations. Both sets of regulations require UGI Utilities to have a winter moratorium on low income terminations. The moratorium in PA begins December 1st and ends March 31st each year. COMAR requires utilities to cease terminations one month earlier effective November 1st. While the Company does have a manual process to continue to work in arrears, non-low-income, residential and commercial accounts during the moratorium, other temperature driver prices limit the amount of work that gets completed during these periods. However the 2020 moratorium was adjusted. On March 13th, 2020, the Pennsylvania Public Utility Commission issued a Public Utility Service Termination Moratorium Proclamation of Disaster Emergency - COVID-19 EMERGENCY ORDER, DOCKET NO. M-2020-301244 whereas it was ordered. That all electric, natural gas, water, wastewater, telecommunications, and steam utilities submit to the Commission's jurisdiction as prohibited from terminating service during the pendency of the Proclamation of Disaster Emergency consistent with this Emergency Order. That order was modified by The Public Utility Service Termination Moratorium - Modification of March 13th Emergency Order, M-2020-301344. The Order allowed for an end to the termination moratorium effective November 9th, 2020, however, the order called for other provisions such as but not limited to, an additional 30 day termination notice, maintaining the moratorium for customers with income levels of or below 300% FPL, or additional reporting requirements. In order for the Company to comply with the updated emergency order extenuating programming changes were required, therefore, we were not able to begin residential terminations until December of 2020. |
| 1.1 Policies include company-level policies that govern the conditions under which the entity may disconnect (or may not disconnect) residential customers. | There are a number of options a customer may exercise to prevent termination. Medical certificates, Protection from Abuse Orders, long-term deposits made to the Company and/or PUC, and enrollment into a Company or PUC payment arrangement (when eligible), all impact the number of customers terminated each month. Additionally, there are programs available to low-income customers that typically remove them from the collection path. These programs can reduce the amount billed each month as well as assist with payment of bills. These programs are, CAP (Customer Assistance Program), LIURP (Low Income usage reduction program), Operation Share (one time a year hardship grant), and LIHEAP. The state managed Low Income Home Energy Assistance Program. The Company also conducts a Cold Weather Intermittent Survey (CWIS), which tracks the number of households where heat-related utility service was terminated during the year and remains without service at the start of the heating season. When contact is made with the customer during the survey process, all options available to the customer to restore service are provided. | All termination notice requirements are followed and there are numerous customer protections one can invoke when disputing a noticed termination. Medical certificates, Protection from Abuse Orders, and a customer's eligibility to enter into a regulated or company arrangement all impact the number of customers terminated each month. Additionally, low-income customers are able to enroll into a number of programs that can assist with lowering or helping pay their monthly bills. Enrollment into these programs typically assist with removing a customer from the collection path. These programs are, CAP (Customer Assistance Program), LIURP (Low Income usage reduction program), Operation Share (one time a year hardship grant), and LIHEAP. The state managed Low Income Home Energy Assistance Program. The Company follows every termination with a regulated Cold Weather Intermittent Survey (CWIS). The process begins approximately October by notifying anyone terminated during that season who still has not contacted, and then follows a series of additional contacts to determine if the household is still without heat by Dec 1 of that year. In these contacts at all available points to reconnect are provided to the customer if needed. | Demand for natural gas remains high in UGI's service territory. One of the primary factors influencing natural gas affordability and adoption is the wholesale price spread between natural gas and oil, in particular. With the abundance of Marcellus Shale gas in PA, UGI residential customers paid 23% less in 2020 as compared to 2008. According to a report from Global Energy Institute, a ban on fracking is estimated to result in a \$256 million increase in the cost of living for an average American, and would eliminate about 19 million jobs. The median household income for Pennsylvania is approximately \$55,000 annually, with the median age at 41 years old. Approximately 31% of households are renter-occupied. The median age is 41 years old. Approximately 31% of households are renter-occupied. |
| 1.2 Programs include those administered at the national, state, local, utility commission, or company-level that are designed to improve the affordability of gas among residential customers, and/or reduce the number and/or duration of residential customer disconnections (e.g., Low Income Home Energy Assistance Programs). | | | |
| 1.3 Regulations include those occurring at the national, state, local, utility commission, or company-level that are designed to improve the affordability of gas among residential customers, and/or reduce the number and/or duration of residential customer disconnections. | | | |
| PA02-2003.6. Discussion of impact of external factors on customer affordability of gas, including the economic conditions of the service territory | | | |
| 1. The entity shall describe the external factors that cause, or are reasonably likely to cause, a significant impact on the affordability of gas among the entity's retail customers. | Demand for natural gas remains high in UGI's service territory. One of the primary factors influencing natural gas affordability and adoption is the wholesale price spread between natural gas and oil, in particular. With the abundance of Marcellus Shale gas in PA, UGI residential customers paid 40% less in 2021 as compared to 2008. Meanwhile, the price of oil spiked in 2022, resulting in approximately \$120 of annual savings for a residential customer converting from oil to natural gas. Fracking has been the subject of interest of economists, policy makers, and various public interest groups. In a report to the President in 2021, the US Department of Energy outlines their findings on the impact of a fracking ban, noting a ripple effect through increased household energy bills, higher fuel costs for industrial and residential customers, higher and more frequent electricity price spikes, and a deteriorating competitiveness of the United States energy supply in the global market. Other public policies that could impact the industry include proposed bans of natural gas equipment in new construction, as well as removing the DOE's Energy Star designation from natural gas equipment, despite meeting efficiency requirements. The median household income for Pennsylvania is approximately \$57,000 annually, while the median age is 41 years old. Approximately 31% of households are renter-occupied. | Demand for natural gas remains high in UGI's service territory. One of the primary factors influencing natural gas affordability and adoption is the wholesale price spread between natural gas and oil, in particular. In 2021, residential customers converting from fuel oil to natural gas realized an average annual savings of approximately \$550. Recently, the price of oil has spiked, representing approximately \$1250 of annual savings for a residential customer converting from oil to natural gas. Fracking has been the subject of interest of economists, policy makers, and various public interest groups. In a report to the President in 2021, the US Department of Energy outlines their findings on the impact of a fracking ban, noting a ripple effect through increased household energy bills, higher fuel costs for industrial and residential customers, higher and more frequent electricity price spikes, and a deteriorating competitiveness of the United States energy supply in the global market. Other public policies that could impact the industry include proposed bans of natural gas equipment in new construction, as well as removing the DOE's Energy Star designation from natural gas equipment, despite meeting efficiency requirements. The median household income for Pennsylvania is approximately \$57,000 annually, while the median age is 41 years old. Approximately 31% of households are renter-occupied. | Demand for natural gas remains high in UGI's service territory. One of the primary factors influencing natural gas affordability and adoption is the wholesale price spread between natural gas and oil, in particular. In 2021, residential customers converting from fuel oil to natural gas realized an average annual savings of approximately \$550. Recently, the price of oil has spiked, representing approximately \$1250 of annual savings for a residential customer converting from oil to natural gas. Fracking has been the subject of interest of economists, policy makers, and various public interest groups. In a report to the President in 2021, the US Department of Energy outlines their findings on the impact of a fracking ban, noting a ripple effect through increased household energy bills, higher fuel costs for industrial and residential customers, higher and more frequent electricity price spikes, and a deteriorating competitiveness of the United States energy supply in the global market. Other public policies that could impact the industry include proposed bans of natural gas equipment in new construction, as well as removing the DOE's Energy Star designation from natural gas equipment, despite meeting efficiency requirements. The median household income for Pennsylvania is approximately \$55,000 annually, with the median age at 41 years old. Approximately 29% of households are renter-occupied. Recently, the price of oil has dropped, representing approximately \$390 of annual savings for a residential customer converting from oil to natural gas. However, longer term data is indicative of residential conversion energy cost savings of approximately \$600 per year. |
| 1.1 External factors are defined as influences outside of the direct control of the entity. | | | |
| 1.2 The scope of external factors includes factors that directly impact current and/or future gas rates, and/or factors that impact customers' current and/or future ability to pay gas bills (i.e., no direct impact to gas rates). | | | |
| 1.3 External factors may include, but are not limited to, geography, climate, weather, and regulations, public policy, and public purpose programs (regardless of whether such factors directly relate to affordability). | | | |
| 1.4 At a minimum, external factors shall include the economic conditions of the service territory. | | | |
| 1.5 The entity may disclose the median household income, poverty rates, employment rates, or other quantitative or qualitative data that depict the economic conditions of the service territory. | | | |
| 2. For each external factor, in addition to a description of the factor, the entity shall briefly describe: | | | |
| 2.1 The frequency and magnitude to which the factor impacts the affordability of gas for the entity's customers. | Please see above | Please see above | Please see above. |
| 2.2 The impact of the factor on the affordability of gas for the entity's customers. | Ongoing risks include customer non-payment, cost recovery uncertainty, as well as public policy. Opportunities include continued customer growth, capital investment opportunities, and public policy changes supporting natural gas midstream expansion. Customer non-payment is tracked vigorously, and offset partially by aggressive marketing of utility programs such as LIHEAP, WARM, CAP, and LIURP. Utilities has a commendable average annual net growth rate of 1.6% across the last 10 years, when most utilities have flat or negative growth. Digital marketing, interwoven with more traditional means as well as a focus on customer experience provide value to customers as well as increase customer satisfaction. Electrification mandates are closely monitored, particularly in the new construction market, as a potential long term risk. UGI Utilities is spending an accelerated amount of capital annually to modernize its distribution network, as well as accommodate new customer growth. Recent capital budgets are in the \$400-\$500MM range. Another opportunity is the sales of new technologies including advanced heat and power, natural gas powered vehicles, renewable natural gas, and liquefied natural gas. The company continues to execute growth strategies related to core market, industrial, and new technologies growth. UGI Utilities also successfully secured regulatory approval to establish a Weather Normalization Adjustment (WNA) and neutralize the effects of weather on revenue and provide for a more predictable financial outlook for customers and the company. | Ongoing risks include customer non-payment, cost recovery uncertainty, as well as public policy. Opportunities include continued customer growth, capital investment opportunities, and public policy changes supporting natural gas midstream expansion. Customer non-payment is tracked vigorously, and offset partially by aggressive marketing of utility programs such as LIHEAP, WARM, CAP, and LIURP. Utilities has a commendable average annual net growth rate of 1.5% for the last 10 years, when most utilities have flat or negative growth. Digital marketing, interwoven with more traditional means as well as a focus on customer experience provide value to customers as well as increase customer satisfaction. Electrification mandates are closely monitored, particularly in the new construction market, as a potential long term risk. UGI Utilities is spending an accelerated amount of capital annually to modernize its distribution network, as well as accommodate new customer growth. Recent capital budgets are in the \$300-\$400MM range. Another opportunity is the sales of new technologies including advanced heat and power, natural gas powered vehicles, renewable natural gas, and liquefied natural gas. The company continues to execute growth strategies related to core market, industrial, and new technologies growth. | Ongoing risks include customer non-payment, cost recovery uncertainty, as well as public policy. Opportunities include continued customer growth, capital investment opportunities, and public policy changes supporting natural gas midstream expansion. Customer non-payment is tracked vigorously, and offset partially by aggressive marketing of utility programs such as LIHEAP, WARM, CAP, and LIURP. More recently, there are CARES Act funding programs available to assist residential customers in arrears impacted by COVID-19. UGI Utilities has a commendable gross growth rate of 1.5% annually for the last 10 years, when most utilities have flat or negative growth. Digital marketing, interwoven with more traditional means as well as a focus on customer experience provide value to customers as well as increase customer growth. Electrification mandates are closely monitored, particularly in the new construction market, as a potential long term risk. UGI Utilities is spending an accelerated amount of capital annually to modernize its distribution network, as well as accommodate new customer growth. Recent capital budgets are in the \$180-\$250MM range. Another opportunity is the sales of new technologies including CHP, NGV's, RNG, and LNG. The company continues to execute growth strategies related to core market, industrial, and new technologies growth. |
| 3. Opportunities may include, but are not limited to, customer growth, capital investment opportunities, regulatory value, and regulation, public policy, and/or public purpose programs that may generate adverse financial impacts. | | | |
| 4. The scope of disclosure includes the affordability of all retail customers within the entity's service territory for gas, which may include, but is not limited to, residential, commercial, industrial, and industrial customers. | Please see above | Please see above | Please see above. |
| 4.1 The entity may disclose low-income residential customers in its disclosures. | | | |
| 5. The entity may describe how its average rates, average bills, and/or customer disconnections compare to other utilities. | For a residential heating customer using 336 MCF per month, UGI's average residential heating bill as of September 30, 2022 was approximately \$115.76. This is less than the average statewide bill of approximately \$124.69. | For a residential heating customer using 335 MCF per month, UGI's average residential heating bill as of September 30, 2021 was approximately \$88.29. This is less than the average statewide bill of approximately \$99.72. | UGI current residential distribution rates is 4% and 20% higher than Peoples Gas and Columbia Gas, respectively and 62% lower than Philadelphia Gas Works. |

| <p>#-00-018 Revenue of (1) Decoupled Rate Structures (2) Lost Revenue Adjustment Mechanism (LRAM)</p> | <p>% of UGI Utilities' gas revenues are derived from decoupled rate structures. Nevertheless, fixed monthly customer charges not dependent on usage account for 15.8% of the Company's revenue on a pro forma basis.</p> | <p>% of UGI Utilities' gas revenues are derived from decoupled rate structures. Nevertheless, fixed monthly customer charges not dependent on usage account for 18.9% of the Company's revenue on a pro forma basis.</p> | <p>% of UGI Utilities' gas revenues are derived from decoupled rate structures. Nevertheless, fixed monthly customer charges not dependent on usage account for 18.8% of the Company's revenue on a pro forma basis.</p> |
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| <p>1. Revenue decoupled rate structures are defined, according to the U.S. National Association of Regulatory Utility Commissioners in Decoupling for Electric & Gas Utilities (September 2007), as a rate adjustment mechanism that separates the entity's gas utility's fixed cost recovery from the amount of gas sold—and the utility's revenues are collected based on the regulatory-determined revenue requirement.</p> <p>1.1 Revenue decoupled rate structures may also be referred to as, "revenue regulator" or "revenue cap regulation," where the regulator establishes an allowed revenue requirement and adjusts collections so as to achieve that allowed, or "target," revenue irrespective of actual sales (definition adapted from, Decoupling Case Studies: Revenue Regulation Implementation in Six States, The Regulatory Assistance Project, July 2014).</p> <p>1.2 A Additional guidance on the scope of revenue decoupled rate structures is contained in Alternative Regulation for Emerging Utility Challenges, 2015 Update, Edison Electric Institute, November 13, 2015.</p> <p>1.3 The scope of decoupled rate structures shall exclude straight fixed-variable rate design and those rate structures that contain a lost revenue adjustment mechanism (LRAM).</p> <p>1.4 The percentage shall be calculated as the total regulated gas utility revenue from revenue decoupled rate structures divided by total regulated gas utility revenue.</p> <p>2. The entity shall disclose the percentage of gas utility revenues from (3) rate structures that contain a LRAM.</p> <p>2.1 Rate structures that contain a LRAM are defined as volumetric rates that contain a mechanism which allows the entity to recover revenues not directly resulting from energy consumption, energy efficiency, demand side management, and/or distributed generation programs and is specifically associated with and implemented on the utility's:</p> <p>2.2 Additional guidance on the scope of LRAMs is contained in Alternative Regulation for Emerging Utility Challenges, 2015 Update, Edison Electric Institute, November 13, 2015.</p> <p>2.3 The scope includes mechanisms that allow the estimation of lost revenues based on the program's actual impacts, but excludes lost revenues from planned or forecasted programs' impacts (as described in Alternative Regulation and Reasonable Approaches for Water Companies, The Brattle Group, September 23, 2013 — while the referenced resource is intended for water utilities, the concept of LRAMs is similar to gas utilities).</p> <p>2.4 The percentage shall be calculated as the total regulated gas utility revenue from rate structures that contain a LRAM divided by total regulated gas utility revenue.</p> <p>3. The scope of disclosure is limited to revenues directly resulting from the provision of gas to retail customers by regulated utilities.</p> | <p>UGI Utilities does not have a rate structure that contains a lost revenue adjustment mechanism. Notwithstanding, UGI's Universal Service Rider allows the Company to collect dollars that would otherwise become uncollectible from low income customers enrolled in its Customer Assistance program from other residential customers.</p> | <p>UGI Utilities does not have a rate structure that contains a lost revenue adjustment mechanism. Notwithstanding, UGI's Universal Service Rider allows the Company to collect dollars that would otherwise become uncollectible from low income customers enrolled in its Customer Assistance program from other residential customers.</p> | <p>UGI Utilities does not have a rate structure that contains a lost revenue adjustment mechanism. Notwithstanding, UGI's Universal Service Rider allows the Company to collect dollars that would otherwise become uncollectible from low income customers enrolled in its Customer Assistance program from other residential customers.</p> |
| <p>#-00-020 Customer gas savings from efficiency measures by market</p> <p>1. The entity shall disclose the total amount of gas savings delivered to customers, in million British thermal units (MMBtu), from energy efficiency measures during the reporting period for each of its markets.</p> <p>1.1 Markets are defined as those operations that are subject to distinct public utility regulatory oversight.</p> <p>1.2 Gas savings are defined according to the gross savings approach as the change in energy consumption (and/or demand) that results from program-related actions taken by participants in an efficiency program, regardless of who they participate.</p> <p>1.3 The entity may list those markets where it reports gas savings on a net savings basis and that may be different from the figures disclosed here, where net gas savings are defined as change in consumption that are specifically attributable to an energy efficiency program, and that would not otherwise have happened in the absence of the program.</p> <p>2. Gas savings shall be calculated in a gross basis but consistent with the methodology set forth in national, state, or local verification, measurement, and verification (EM&V) regulations where such savings occur, where examples of U.S. state regulations include, but are not limited to:</p> <p>2.1 California Public Utilities Commission Decision 09-09-047</p> <p>2.2 Minnesota Statutes 216B.045</p> <p>2.3 New York Case 07-M-0458</p> <p>3. Where national, state, or local regulations do not exist, the entity shall calculate gas savings consistent with the measurement and verification methods outlined by the U.S. Department of Energy's (DOE) Federal Energy Management Program (FEMP) EM&V Guidelines: Measurement and Verification for Federal Energy Projects, Version 4.0.</p> <p>4. The scope of gas savings from efficiency measures includes savings delivered directly by the entity and, where regulations provide, savings substantiated by purchases of efficiency and/or credits.</p> <p>4.1 For any savings from efficiency measures delivered directly by the entity, any efficiency savings credits must be retained (i.e., not sold) and applied on behalf of the entity in order for the entity to claim them.</p> <p>4.2 For efficiency savings credits that are purchased, the agreement must explicitly include and convey that credits be retained and retired on behalf of the entity in order for the entity to claim them.</p> <p>5. Relevant regulations governing efficiency savings credits include the following regulations in the U.S.:</p> <p>5.1 Connecticut House Bill 7157</p> <p>5.2 Nevada Regulation of Public Utilities Chapter 700</p> <p>6. The entity shall consider guidance on regulations as a normative reference, thus any updates made year-on-year shall be considered updates to this guidance.</p> | <p>For 2022, verified first year gross savings are as follows: Residential sector: 107,302 MMBtu Commercial & Industrial sector: 113,716 MMBtu</p> <p>UGI Utilities' gas savings from its Energy Efficiency & Conservation (EE&C) programs are calculated using an established Technical Reference Manual (TRM) that provides savings assumptions at the EE&C measure level detail, approved in Docket Number R-2015-25184B before the Pennsylvania Public Utility Commission.</p> <p>Not applicable</p> <p>Efficiency savings credits are not applicable to UGI Utilities' programs.</p> <p>Not applicable. See above response.</p> <p>Understood.</p> | <p>For 2022, verified first year gross savings are as follows: Residential sector: 116,340 MMBtu Commercial & Industrial sector: 29,491 MMBtu</p> <p>UGI Utilities' gas savings from its Energy Efficiency & Conservation (EE&C) programs are calculated using an established Technical Reference Manual (TRM) that provides savings assumptions at the EE&C measure level detail, approved in Docket Number R-2015-25184B before the Pennsylvania Public Utility Commission.</p> <p>Not applicable</p> <p>Efficiency savings credits are not applicable to UGI Utilities' programs.</p> <p>Not applicable. See above response.</p> <p>Understood.</p> | <p>For 2022, verified first year gross savings are as follows: Residential sector: 119,913 MMBtu Commercial & Industrial sector: 22,666 MMBtu</p> <p>UGI Utilities' gas savings from its Energy Efficiency & Conservation (EE&C) programs are calculated using an established Technical Reference Manual (TRM) that provides savings assumptions at the EE&C measure level detail, approved in Docket Number R-2015-25184B before the Pennsylvania Public Utility Commission.</p> <p>Not applicable.</p> <p>Efficiency savings credits are not applicable to UGI Utilities' programs.</p> <p>Not applicable. See above response.</p> <p>Understood.</p> |
| <p>Notes to #F-GU-020-2</p> <p>1. The entity shall discuss customer efficiency measures that are required by regulations for each of its relevant markets, including a description of:</p> <p>1.1 The amount or percentage of gas savings from efficiency measures required by regulations for each market</p> <p>1.2 Instances of non-compliance with gas savings obligations.</p> <p>1.3 In such instances, the entity shall disclose the difference between the gas savings delivered and the amount required by the regulation.</p> <p>1.4 Gas savings delivered that exceed those required by regulations and that resulted in the entity receiving energy efficiency performance incentives, including the value of any associated incentives.</p> <p>2. Relevant regulations include, but are not limited to:</p> <p>2.1 California Public Utilities Commission Decision 14-10-046</p> <p>2.2 Illinois Public Act 1009-0010</p> <p>2.3 Massachusetts Department of Public Utilities Three Year Energy Efficiency Plan 15-160 to 15-169</p> <p>2.4 Minnesota Statutes 116B.041</p> <p>3. The entity shall discuss the policy mechanisms in place for each market that allow for or incentivize energy efficiency, including a description of the benefits, challenges, and financial impacts associated with such mechanisms.</p> <p>4. Relevant policy mechanisms to discuss include, but are not limited to:</p> <p>4.1 Deferral decoupling</p> <p>4.2 Current period decoupling</p> <p>4.3 Single fixed variable rates</p> <p>4.4 Lost revenue adjustments</p> <p>4.5 Energy efficiency rebates</p> <p>5. The entity may discuss incentives it has developed for its customers that promote end-use efficiency, including, but not limited to, energy efficiency rebates, and other measures to subsidize customer energy efficiency.</p> | <p>All savings achieved by UGI Utilities are beyond those required by regulation as the Company's EE&C programs are voluntary.</p> <p>Not applicable.</p> <p>UGI Utilities utilizes a volumetric customer distribution surcharge to recover costs associated with managing the Company's energy efficiency programs.</p> <p>UGI Utilities does not utilize decoupling nor does it make lost revenue adjustments as part of the Company's EE&C programs. Estimated usage reductions are factored into the calculation of the Company's base rates.</p> <p>UGI Utilities offers a variety of energy efficiency programs to its residential and commercial customers. The current EE&C Plan is a five-year, approximately \$63MM program that was designed to encourage customers to install high efficiency appliances over less expensive, standard efficiency appliances by providing incentives to offset the incremental equipment cost. By participating in these programs, customers receive the benefits of saving energy and money, both in terms of receiving a rebate for the equipment installation, and lower utility bills. Common measures installed include smart thermostats, natural gas furnaces, boilers, and water heaters. The Company also offers residential and commercial audit programs to enhance the efficiency of homes and businesses, along with incentives for Combined Heat & Power (CHP) projects. In 2022, UGI issued \$8.8MM in rebates to customers across the residential, commercial, and industrial sectors.</p> | <p>All savings achieved by UGI Utilities are beyond those required by regulation as the Company's EE&C programs are voluntary.</p> <p>Not applicable.</p> <p>UGI Utilities utilizes a volumetric customer distribution surcharge to recover costs associated with managing the Company's energy efficiency programs.</p> <p>UGI Utilities does not utilize decoupling nor does it make lost revenue adjustments as part of the Company's EE&C programs. Estimated usage reductions are factored into the calculation of the Company's base rates.</p> <p>UGI Utilities offers a variety of energy efficiency programs to its residential and commercial customers. The current EE&C Plan is a five-year, approximately \$63MM program that was designed to encourage customers to install high efficiency appliances over less expensive, standard efficiency appliances by providing incentives to offset the incremental equipment cost. By participating in these programs, customers receive the benefits of saving energy and money, both in terms of receiving a rebate for the equipment installation, and lower utility bills. Common measures installed include smart thermostats, natural gas furnaces, boilers, and water heaters. The Company also offers residential and commercial audit programs to enhance the efficiency of homes and businesses, along with incentives for Combined Heat & Power (CHP) projects. In 2022, UGI issued \$7.95MM in rebates to customers across the residential, commercial, and industrial sectors.</p> | <p>All savings achieved by UGI Utilities are beyond those required by regulation as the Company's EE&C programs are voluntary.</p> <p>Not applicable.</p> <p>UGI Utilities utilizes a volumetric customer distribution surcharge to recover costs associated with managing the Company's energy efficiency programs.</p> <p>UGI Utilities does not utilize decoupling nor does it make lost revenue adjustments as part of the Company's EE&C programs. Estimated usage reductions are factored into the calculation of the Company's base rates.</p> <p>UGI Utilities offers a variety of energy efficiency programs to its residential and commercial customers. The current EE&C Plan is a five-year, approximately \$63MM program that was designed to encourage customers to install high efficiency appliances over less expensive, standard efficiency appliances by providing incentives to offset the incremental equipment cost. By participating in these programs, customers receive the benefits of saving energy and money, both in terms of receiving a rebate for the equipment installation, and lower utility bills. Common measures installed include smart thermostats, natural gas furnaces, boilers, and water heaters. The Company also offers residential and commercial audit programs to enhance the efficiency of homes and businesses, along with incentives for Combined Heat & Power (CHP) projects. In 2020, UGI issued \$6.5MM in rebates to customers across the residential, commercial, and industrial sectors.</p> |
| <p>#F-GU-021 Number of (1) Unexcused Absences (2) Corrective Action Orders (CAOs) (3) Incidents of Process Violation (4) PHMSA reportable pipeline incidents, where:</p> | <p>UGI had 1 reportable incident in 2023. On December 13, 2023, a plumbline excavator struck a steel energy line and pulled the line from an indoor meter. This led to an explosion which destroyed the house. The residents were evacuated and there were no fatalities nor injuries requiring hospitalization.</p> | <p>UGI had 2 reportable incidents in 2021. On February 2, 2021, a snowblower hit a vent line from an inside regulator. The impact broke the regulator at the vent the connection and allowed gas to enter the basement. There was a low level explosion which did not result in any injuries, but the building sustained minor damage. On August 18, 2021, roofing took down water and debris broke a 4" by 2" reducer on the regulator station. There were no injuries, but the regulator station had to be rebuilt.</p> | <p>UGI had one reportable incident in calendar year 2020. On December 25, 2020, a 12" PE pipeline separated at a butt fusion. This failure created blowing gas in the roadway which resulted in a vehicle accident with one fatality and 2 injuries.</p> |
| <p>2. The entity shall disclose the number of PHMSA Corrective Action Orders (CAOs) received, where:</p> <p>2.1 A CAO is issued when a particular pipeline facility is found to be hazardous to life, property, or the environment. A corrective action may include suspended or restricted use of the facility, physical inspection, testing, repair, replacement, or other appropriate action, consistent with the definition provided by U.S. 49 CFR 192.313.</p> <p>3. The entity shall disclose the number of PHMSA Probable Violations (PVs) received, where:</p> <p>3.1 An NPV is defined as the beginning of an enforcement proceeding that contains a statement of the provisions of the laws, regulations, or orders that the respondent is alleged to have violated and a statement of the evidence upon which the allegations are based, consistent with the definition provided in U.S. 49 CFR 192.309.</p> | <p>Zero (0)</p> <p>Zero (0)</p> <p>Zero (0)</p> | <p>Zero (0)</p> <p>Zero (0)</p> <p>Zero (0)</p> | <p>Zero (0)</p> <p>Zero (0)</p> <p>Zero (0)</p> |
| <p>Notes to #F-GU-020-1</p> | <p>Zero (0)</p> | <p>Zero (0)</p> | <p>Zero (0)</p> |
| <p>1. The entity shall discuss notable incidents such as those that affected a significant number of customers, created extended disruptions to service, or resulted in a PHMSA "serious incident."</p> <p>1.1 PHMSA serious incidents are defined as incidents that resulted in a fatality or an injury requiring in-patient hospitalization.</p> <p>2. For such incidents, the entity may provide:</p> <p>2.1 A description and cause of the incident</p> <p>2.2 The total population affected by the incident</p> <p>2.3 The costs associated with the incident</p> <p>2.4 Other actions taken to mitigate the potential for future service interruptions</p> <p>3. Any other significant outcomes to a legal proceeding, serious injuries, and/or fatalities.</p> | <p>Zero (0)</p> <p>Zero (0)</p> | <p>Zero (0)</p> <p>Zero (0)</p> | <p>The incident mentioned in the prior section qualifies as serious. The pipeline pressure has been lowered.</p> <p>5 customers interrupted</p> <p>Estimated cost of damages is \$83,000.</p> <p>Pressure was reduced and additional leak surveys are being conducted. UGI has also replaced a section of the pipeline immediately around the site of the incident as a precautionary measure.</p> <p>1 fatality, 2 injuries. No civil action filed to date.</p> |

| FCR-USA-2 Percentage of distribution pipelines that are (1) cast iron or wrought iron and (2) unprotected steel | | | |
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| 1. The entity that discloses the percentage, by length, of its natural gas pipelines that are (1) cast iron or wrought iron, and separately, (2) unprotected steel. | | | |
| 1.1 A distribution pipeline is defined according to U.S. 49 CFR 192.3 as a pipeline other than a gathering or transmission line, where: | | | |
| 1.1.1 A gathering line is defined as a pipeline that transports gas from a current production facility to a transmission line or main; and | | | |
| 1.1.2 A transmission line is defined as a pipeline, other than a gathering line, that (1) transports gas from a gathering line or storage facility to a distribution center, storage facility, or large-volume customer that is not downstream from a distribution center; (2) operates at a hoop stress of 20 percent or more of the specified minimum yield strength (SMYS); or (3) transports gas within a storage field. | | | |
| 1.2 Cast iron or wrought iron is defined as iron that is heated to its melting point and poured into molds and cannot be molded or screwed. | 122 km (113 mi) of Cast Iron/Wrought Iron pipeline.* | 257 km (160 mi) of Cast Iron/Wrought Iron pipeline.* | 322 km (200 mi) of Cast Iron/Wrought Iron pipeline.* |
| 1.3 Unprotected steel is defined as steel with no form of corrosion protection. | 87,289 (542 mi) of unprotected steel distribution pipeline.* | 102,223 km (63 mi) of unprotected steel distribution pipeline.* | 1084 km (674 mi) of unprotected steel distribution pipeline.* |
| 2. The percentage of (1) cast iron or wrought iron distribution pipelines shall be calculated as the total length of cast iron or wrought iron pipelines that the entity owns or operates divided by the total length of distribution pipelines that the entity owns and/or operates. | 0.9% of all UGI Utilities distribution pipelines are cast iron and/or wrought iron.* | 1.3% of all UGI Utilities distribution pipelines are cast iron and/or wrought iron.* | 2% of all UGI Utilities distribution pipelines are cast iron and/or wrought iron.* |
| 3. The percentage of (2) unprotected steel distribution pipelines shall be calculated as the total length of unprotected steel pipelines that the entity owns or operates divided by the total length of distribution pipelines that the entity owns and/or operates. | 4.6% of all UGI Utilities distribution pipelines are unprotected steel.* | 4.7% of all UGI Utilities distribution pipelines are unprotected steel.* | 5% of all UGI Utilities distribution pipelines are unprotected steel.* |
| 4. The entity may discuss its pipeline replacement rates, its use of polyethylene pipes, or other efforts to reduce fugitive emissions and leaks and improve the safety of its distribution pipelines. | UGI Utilities has committed to replacing all cast iron mains by 2027 and bare steel/wrought iron mains by 2041. On average, UGI replaces 66-70 miles of cast iron and bare steel/wrought iron main per year. With the extensive replacement efforts well underway, UGI utilizes contemporary materials such as plastic or cathodically protected steel to replace non-contemporary materials. Currently, UGI's distribution system is comprised of approximately 90.8% of polyethylene or coated steel mains. Parallel to these efforts, UGI has witnessed a 34% reduction in hazardous C (Grade 1) leaks and an 8% reduction in B (Grade 2) leak inventory levels in the past 5 years. | UGI Utilities has committed to replacing all cast iron mains by 2027 and bare steel/wrought iron mains by 2041. On average, UGI replaces 66-70 miles of cast iron and bare steel/wrought iron main per year. With the extensive replacement efforts well underway, UGI utilizes contemporary materials such as plastic or cathodically protected steel to replace non-contemporary materials. Currently, UGI's distribution system is comprised of approximately 90.3% of contemporary materials. Parallel to these efforts, UGI has witnessed a 22% reduction in hazardous C (Grade 1) leaks and an 53% reduction in B (Grade 2) leak inventory levels in the past 5 years. | UGI Utilities has committed to replacing all cast iron mains by 2027 and bare steel/wrought iron mains by 2041. On average, UGI replaces 60-64 miles of cast iron and bare steel/wrought iron main per year. With the extensive replacement efforts well underway, UGI utilizes contemporary materials such as plastic or cathodically protected steel to replace non-contemporary materials. Currently, UGI's distribution system is comprised of approximately 89.3% of contemporary materials. Parallel to these efforts, UGI has witnessed a 40% reduction in hazardous C (Grade 1) leaks and an 89% reduction in B (Grade 2) leak inventory levels in the past 5 years. |
| | *Data provided on a calendar year basis ending December 31, 2022. | *Data provided on a calendar year basis ending December 31, 2021. | *Data provided on a calendar year basis ending December 31, 2020. |
| FCR-USA-3 Percentage of gas (1) transmission and (2) distribution pipelines inspected | | | |
| 1. The entity that discloses the percentage, by length, of gas (1) transmission pipelines, and separately, (2) distribution pipelines that were inspected during the reporting period. | | | |
| 1.1 A transmission pipeline is defined, according to U.S. 49 CFR 192.3, as a pipeline, other than a gathering line, that (1) transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center; (2) operates at a hoop stress of 20 percent or more of the specified minimum yield strength (SMYS); or (3) transports gas within a storage field. | 363 miles operated by UGI Utilities.* | 307 miles operated by UGI Utilities.* | 307 miles operated by UGI Utilities. |
| 1.2 A distribution pipeline is defined, according to U.S. 49 CFR 192.3, as a pipeline other than a gathering or transmission line. | 2,447 operated by UGI Utilities.* | 12,214 operated by UGI Utilities.* | 12,108 operated by UGI Utilities.* |
| 2. Inspection activities include those listed under U.S. 49 CFR 192 for gas pipelines, including: | This section provides transmission pipeline inspections only. | This section provides transmission pipeline inspections only. | This section provides transmission pipeline inspections only. |
| 2.1 Internal inspection tool or tools capable of detecting corrosion and any other threats to which the covered segment is susceptible | 100%* | 96%* | 96%* |
| 2.2 Pressure tests | 0%* | 0%* | 0%* |
| 2.3 Direct assessment to address threats of external corrosion, internal corrosion, or stress corrosion cracking | 0%* | 0%* | 0%* |
| 2.4 Other technology that an operator demonstrates can provide an equivalent understanding of the condition of the line gas | 0%* | 0%* | 0%* |
| 2.5 If other technologies were used by the entity to conduct inspections per 24 CFR 192 or 20 CFR 195, the entity shall discuss which technology was used. | 0%* | 0%* | 0%* |
| 3. The percentage is calculated as the length of gas pipelines inspected divided by the total length of gas pipelines. | 5% of total transmission pipeline inspected.* | 5% of total transmission pipeline inspected.* | 5% of total transmission pipeline inspected.* |
| | *Data provided on a calendar year basis ending December 31, 2022. | *Data provided on a calendar year basis ending December 31, 2021. | *Data provided on a calendar year basis ending December 31, 2020. |
| FCR-USA-4 Description of efforts to minimize the integrity of gas delivery infrastructure including risks related to safety and emissions | | | |
| 1. The entity that describes its efforts to manage the integrity of gas delivery infrastructure. | | | |
| 1.1 Gas delivery infrastructure includes, but is not limited to, transmission pipelines, distribution pipelines, storage facilities, compressor stations, metering and regulation stations, and liquid natural gas facilities. | UGI has a comprehensive Distribution Integrity Management Program (DIMP) to manage our distribution assets and comprehensive Transmission Integrity Management Program (TIMP) to manage the integrity of our transmission system. As applicable, metering and regulating facilities are also included in the DIMP and TIMP plans along with an inspection and maintenance plan as specified in our Gas Operations Manual (GOM). UGI Utilities does not operate storage facilities, compressor stations, nor permanent LNG facilities. | UGI has a comprehensive Distribution Integrity Management Program (DIMP) to manage our distribution assets and comprehensive Transmission Integrity Management Program (TIMP) to manage the integrity of our transmission system. As applicable, metering and regulating facilities are also included in the DIMP and TIMP plans along with an inspection and maintenance plan as specified in our Gas Operations Manual (GOM). UGI Utilities does not operate storage facilities, compressor stations, nor permanent LNG facilities. | UGI has a comprehensive Distribution Integrity Management Program (DIMP) to manage our distribution assets and comprehensive Transmission Integrity Management Program (TIMP) to manage the integrity of our transmission system. As applicable, metering and regulating facilities are also included in the DIMP and TIMP plans along with an inspection and maintenance plan as specified in our Gas Operations Manual (GOM). UGI Utilities does not operate storage facilities, compressor stations, nor permanent LNG facilities. |
| 1.2 Efforts may include, but are not limited to, those related to employee training, emergency preparedness, process safety, and asset integrity management. | UGI provides annual emergency response and preparedness training for employees which included Incident Command Training (ICS). UGI also provides training and education for public officials and public emergency responders. | UGI provides annual emergency response and preparedness training for employees which included Incident Command Training (ICS). UGI also provides training and education for public officials and public emergency responders. | UGI provides annual emergency response and preparedness training for employees which included Incident Command Training (ICS). UGI also provides training and education for public officials and public emergency responders. |
| 1.3 Relevant information to provide includes, but is not limited to, the use of standards, industry best practices, benchmarking, and participation in third-party initiatives, which may include, but are not limited to: | | | |
| 1.3.1 The American Gas Association's (AGA) Peer Review Program | UGI Utilities has participated in the AGA Peer Review Program since its inception, and remains a regular participant. UGI was actually the first company to be reviewed in the AGA Peer Review Program as one of the 10 pilot companies. The next peer review is scheduled for October of 2024. <i>This review has been delayed several times due to disruptions related to COVID-19.</i> | UGI Utilities has participated in the AGA Peer Review Program since its inception, and remains a regular participant. UGI was actually the first company to be reviewed in the AGA Peer Review Program as one of the 10 pilot companies. The next peer review is scheduled for October of 2023. <i>This review has been delayed several times due to disruptions related to COVID-19.</i> | UGI Utilities participates in the AGA Peer Review Program and is a regular participant. UGI was actually the first company to be reviewed in the AGA Peer Review Program as one of the 10 pilot companies. |
| 1.3.2 American Petroleum Institute (API) Recommended Practices 1170 and 1171 | UGI Utilities neither owns nor operates any natural gas storage facilities. | UGI Utilities neither owns nor operates any natural gas storage facilities. | UGI Utilities neither owns nor operates any natural gas storage facilities. |
| 1.3.3 Natural Gas Industry Safety Program, as outlined by the American Gas Association | One-Call: UGI Utilities has been a member of PA One-Call since 1979 and have consistently had members on the Board of Directors since that time. UGI is also active in the Common Ground Alliance (CGA) and has membership on the CGA committee. UGI is participating in the Northeast Gas Association sponsored program to implement Pipeline Safety Management Systems (PSMS), pursuant to the American Petroleum Institute standard API 1173. Call-Before-You-Dig and "Dig Safely" Programs: UGI Utilities actively participates in these programs in PA and MD. UGI has training programs on its web site for outreach training for all participants in the program. UGI also had several instructors certified to train required compliance instruction for excavators and locators in PA. UGI is a member of the Good Street Standard (GSS). This program certifies excavators in certain safe digging requirements: follow safe digging practices, management sign-off committed to the safe digging process, root cause and corrective actions and documentation of events and incidents. See Public Education Programs for more information. Pipeline Markers: UGI Utilities installs and maintains above-ground markers to indicate the location of buried gas lines. At a minimum, line markers are placed at each crossing of a public road, except in very urban areas where utility locator services are more prevalent (see One-Call above). Visual Inspections: Leak survey and patrolling are performed on various pipelines regularly to identify potential problems. The patrols vary according to population density and individual company policy, but all transmission lines are patrolled at least once per year. The inspectors look for construction activity, signs of leakage, such as dried-out vegetation, or conditions that could affect the pipeline, such as soil erosion, and use gas detection instruments to inspect for leaks on the pipelines. Inspections are done on foot, in vehicles and via drones for difficult to access facilities. | One-Call: UGI Utilities has been a member of PA One-Call since 1979 and have consistently had members on the Board of Directors since that time. UGI is also active in the Common Ground Alliance (CGA) and has membership on the CGA committee. UGI is participating in the Northeast Gas Association sponsored program to implement Pipeline Safety Management Systems (PSMS), pursuant to the American Petroleum Institute standard API 1173. Call-Before-You-Dig and "Dig Safely" Programs: UGI Utilities actively participates in these programs in PA and MD. UGI has training programs on its web site for outreach training for all participants in the program. 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Call-Before-You-Dig and "Dig Safely" Programs: UGI Utilities actively participates in these programs in PA and MD. UGI has training programs on its web site for outreach training for all participants in the program. UGI also had several instructors certified to train required compliance instruction for excavators and locators in PA. UGI is a member of the Good Street Standard (GSS). This program certifies excavators in certain safe digging requirements: follow safe digging practices, management sign-off committed to the safe digging process, root cause and corrective actions and documentation of events and incidents. See Public Education Programs for more information. Pipeline Markers: UGI Utilities installs and maintains above-ground markers to indicate the location of buried gas lines. At a minimum, line markers are placed at each crossing of a public road, except in very urban areas where utility locator services are more prevalent (see One-Call above). Visual Inspections: Leak survey and patrolling are performed on various pipelines regularly to identify potential problems. The patrols vary according to population density and individual company policy, but all transmission lines are patrolled at least once per year. The inspectors look for construction activity, signs of leakage, such as dried-out vegetation, or conditions that could affect the pipeline, such as soil erosion, and use gas detection instruments to inspect for leaks on the pipelines. Inspections are done on foot, in vehicles and via drones for difficult to access facilities. |
| | Materials Specifications: Material specifications are provided to manufacturers of the various materials used by UGI Utilities in its gas systems. The manufacturers of gas materials are required to make their respective materials according to stringent industry specifications from testing and standards organizations such as API (American Petroleum Institute), ASTM (American Society for Testing and Materials), ASME (American Society of Mechanical Engineers International), MSS (Manufacturers Standardization Society), NACE (National Association of Corrosion Engineers), GTI (Gas Technology Institute), NFPA (National Fire Protection Association), Plastics Pipe Institute (PPI). | Materials Specifications: Material specifications are provided to manufacturers of the various materials used by UGI Utilities in its gas systems. The manufacturers of gas materials are required to make their respective materials according to stringent industry specifications from testing and standards organizations such as API (American Petroleum Institute), ASTM (American Society for Testing and Materials), ASME (American Society of Mechanical Engineers International), MSS (Manufacturers Standardization Society), NACE (National Association of Corrosion Engineers), GTI (Gas Technology Institute), NFPA (National Fire Protection Association), Plastics Pipe Institute (PPI). | Materials Specifications: Material specifications are provided to manufacturers of the various materials used by UGI Utilities in its gas systems. The manufacturers of gas materials are required to make their respective materials according to stringent industry specifications from testing and standards organizations such as API (American Petroleum Institute), ASTM (American Society for Testing and Materials), ASME (American Society of Mechanical Engineers International), MSS (Manufacturers Standardization Society), NACE (National Association of Corrosion Engineers), GTI (Gas Technology Institute), NFPA (National Fire Protection Association), Plastics Pipe Institute (PPI). |
| | Construction Techniques: Installers are qualified either annually (plastic fusion) or every 6 months (welders), ensuring quality joints when assembling pipes. Non-Destructive testing (NDT) techniques such as x-rays, ultrasonic and other tests are used to check welds as an additional safeguard. Pipelines are also subjected to pressure tests (using air, nitrogen or water) and pressurized to exceed the pressure level that will be created by the amount of gas the pipe will carry to test the integrity of the pipe. | Construction Techniques: Installers are qualified either annually (plastic fusion) or every 6 months (welders), ensuring quality joints when assembling pipes. Non-Destructive testing (NDT) techniques such as x-rays, ultrasonic and other tests are used to check welds as an additional safeguard. Pipelines are also subjected to pressure tests (using air, nitrogen or water) and pressurized to exceed the pressure level that will be created by the amount of gas the pipe will carry to test the integrity of the pipe. | Construction Techniques: Installers are qualified either annually (plastic fusion) or every 6 months (welders), ensuring quality joints when assembling pipes. Non-Destructive testing (NDT) techniques such as x-rays, ultrasonic and other tests are used to check welds as an additional safeguard. Pipelines are also subjected to pressure tests (using air, nitrogen or water) and pressurized to exceed the pressure level that will be created by the amount of gas the pipe will carry to test the integrity of the pipe. |

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| <p>Corrosion and Damage Control and Inspection: Steel (contemporary) gas lines are installed with corrosion control coatings on the outside surface. Cathodic protection methods are used to protect any areas where the coating may become damaged over time. Trained and certified personnel routinely apply survey techniques using specialized electronic equipment to evaluate gas line conditions to ensure adequate levels of cathodic protection, and in some instances evaluate for coating defects to identify areas of concern before they become a problem.</p> <p>All exposed pipelines are evaluated for pipe and coating conditions, with remedial actions taken, if necessary. In addition, government regulations require surveys of pipelines with local detectors at specified intervals, with the frequency depending on material and whether the pipe is located in a populated area or a rural region.</p> <p>Smart pigs are in-line inspection devices that are propelled or tethered through the gas system while recording detailed data about the condition of the line (wall loss, dents, bends, etc.). Pigs are generally used on transmission and high pressure distribution lines that have either been specially designed or modified to accommodate in-line inspections.</p> <p>UGI Utilities complies at a minimum with the required assessments identified by PHMSA and inspection frequencies for all cathodic protection systems, transmission line assessments, atmospheric corrosion inspection, regulator stations including relief devices and emergency valves. In addition, UGI has stringent training and testing programs for employees involved in any aspect of operations, maintenance or repair.</p> | <p>Corrosion and Damage Control and Inspection: Steel (contemporary) gas lines are installed with corrosion control coatings on the outside surface. Cathodic protection methods are used to protect any areas where the coating may become damaged over time. Trained and certified personnel routinely apply survey techniques using specialized electronic equipment to evaluate gas line conditions to ensure adequate levels of cathodic protection, and in some instances evaluate for coating defects to identify areas of concern before they become a problem.</p> <p>All exposed pipelines are evaluated for pipe and coating conditions, with remedial actions taken, if necessary. In addition, government regulations require surveys of pipelines with local detectors at specified intervals, with the frequency depending on material and whether the pipe is located in a populated area or a rural region.</p> <p>Smart pigs are in-line inspection devices that are propelled or tethered through the gas system while recording detailed data about the condition of the line (wall loss, dents, bends, etc.). Pigs are generally used on transmission and high pressure distribution lines that have either been specially designed or modified to accommodate in-line inspections.</p> <p>UGI Utilities complies at a minimum with the required assessments identified by PHMSA and inspection frequencies for all cathodic protection systems, transmission line assessments, atmospheric corrosion inspection, regulator stations including relief devices and emergency valves. In addition, UGI has stringent training and testing programs for employees involved in any aspect of operations, maintenance or repair.</p> | <p>Corrosion and Damage Control and Inspection: Steel (contemporary) gas lines are installed with corrosion control coatings on the outside surface. Cathodic protection methods are used to protect any areas where the coating may become damaged over time. Trained and certified personnel routinely apply survey techniques using specialized electronic equipment to evaluate gas line conditions to ensure adequate levels of cathodic protection, and in some instances evaluate for coating defects to identify areas of concern before they become a problem.</p> <p>All exposed pipelines are evaluated for pipe and coating conditions, with remedial actions taken, if necessary. In addition, government regulations require surveys of pipelines with local detectors at specified intervals, with the frequency depending on material and whether the pipe is located in a populated area or a rural region.</p> <p>Smart pigs are in-line inspection devices that are propelled or tethered through the gas system while recording detailed data about the condition of the line (wall loss, dents, bends, etc.). Pigs are generally used on transmission and high pressure distribution lines that have either been specially designed or modified to accommodate in-line inspections.</p> <p>UGI Utilities complies at a minimum with the required assessments identified by PHMSA and inspection frequencies for all cathodic protection systems, transmission line assessments, atmospheric corrosion inspection, regulator stations including relief devices and emergency valves. In addition, UGI has stringent training and testing programs for employees involved in any aspect of operations, maintenance or repair.</p> |
| <p>Industry and Peer Education Programs: Through technical conferences and seminars, members of the natural gas industry share information and experiences on all aspects of operating a gas system with others in the industry. UGI Utilities regularly sends representatives to the American Gas Association's annual Operators Conference, where more than 200 technical papers are presented and made available to the industry. These papers cover topics ranging from pattern analysis software for system mapping to the use of trenchless technology for reworking or repairing gas pipelines. Industry trade associations also publish numerous manuals, books, pamphlets and studies on delivery system operations and "best practices" programs, in which UGI Utilities regularly participates. UGI also attends industry sharing events sponsored by the Energy Association of PA (EAP), events sponsored by the PA Public Utility Commission (PUC), and various educational programs for the Gas Utility Industry such as the Appalachian Gas Measurement Short Course in Pittsburgh, PA and the Appalachian Underground Corrosion Short Course (AUCSC) in Morgantown, WV.</p> | <p>Industry and Peer Education Programs: Through technical conferences and seminars, members of the natural gas industry share information and experiences on all aspects of operating a gas system with others in the industry. UGI Utilities regularly sends representatives to the American Gas Association's annual Operators Conference, where more than 200 technical papers are presented and made available to the industry. These papers cover topics ranging from pattern analysis software for system mapping to the use of trenchless technology for reworking or repairing gas pipelines. Industry trade associations also publish numerous manuals, books, pamphlets and studies on delivery system operations and "best practices" programs, in which UGI Utilities regularly participates. UGI also attends industry sharing events sponsored by the Energy Association of PA (EAP), events sponsored by the PA Public Utility Commission (PUC), and various educational programs for the Gas Utility Industry such as the Appalachian Gas Measurement Short Course in Pittsburgh, PA and the Appalachian Underground Corrosion Short Course (AUCSC) in Morgantown, WV.</p> | <p>Industry and Peer Education Programs: Through technical conferences and seminars, members of the natural gas industry share information and experiences on all aspects of operating a gas system with others in the industry. UGI Utilities regularly sends representatives to the American Gas Association's annual Operators Conference, where more than 200 technical papers are presented and made available to the industry. These papers cover topics ranging from pattern analysis software for system mapping to the use of trenchless technology for reworking or repairing gas pipelines. Industry trade associations also publish numerous manuals, books, pamphlets and studies on delivery system operations and "best practices" programs, in which UGI Utilities regularly participates. UGI also attends industry sharing events sponsored by the Energy Association of PA (EAP), events sponsored by the PA Public Utility Commission (PUC), and various educational programs for the Gas Utility Industry such as the Appalachian Gas Measurement Short Course in Pittsburgh, PA and the Appalachian Underground Corrosion Short Course (AUCSC) in Morgantown, WV.</p> |
| <p>Public Education Programs: UGI Utilities offers a Safe Digging presentation available upon request for excavators and contractors to educate excavators about their responsibilities under the Dnr Call Act and safe excavation practices around natural gas facilities. National Education Foundation, NEF, along with UGI representatives, conduct educational presentations to 4th grade students across our service territory regarding natural gas safety and 811 call your dig awareness annually. Paradigm Liaison Services provides pipeline safety awareness training, in accordance with Recommended Practice 1162 education, to Emergency Services Personnel, Public Officials and Excavators. UGI Utilities' Public Awareness Program is a comprehensive education for four stakeholder groups: excavators, emergency responders, public officials and affected public communities served. UGI is a member of Pipeline Association for Public Awareness (PAPA), which performs safety awareness training to the affected public. UGI makes Web-based training available to emergency responders through a site called RTUJ. Responding to Utility Emergencies. UGI offers a person a training program called "A Shared View, Responding to Natural Gas Emergencies" that provides UGI specific natural gas safety information for emergency services personnel.</p> | <p>Public Education Programs: UGI Utilities provides a Dig Safety program available upon request for excavators who have frequent offenders two or more dig in a six month period to provide additional safe digging practices. NEF (National Education Foundation) along with UGI representatives makes presentations regarding an 811 school program to educate children annually. Paradigm Liaison Services provides Recommended Practice 1162 education to Emergency Services Personnel. UGI Utilities' Public Awareness Program is a comprehensive education for four stakeholder groups: excavators, emergency responders, public officials and affected public communities served. UGI is a member of PAPA (Pipeline Association for Public Awareness), which performs safety awareness training to the affected public. UGI makes Web-based training available to emergency responders through a site called RTUJ. Responding to Utility Emergencies. UGI provides additional training programs in its web site called "A Shared View," that provides UGI specific natural gas safety information for emergency services personnel.</p> | <p>Public Education Programs: UGI Utilities provides a Dig Safety program available upon request for excavators who have frequent offenders two or more dig in a six month period to provide additional safe digging practices. NEF (National Education Foundation) along with UGI representatives makes presentations regarding an 811 school program to educate children annually. Paradigm Liaison Services provides Recommended Practice 1162 education to Emergency Services Personnel. UGI Utilities' Public Awareness Program is a comprehensive education for four stakeholder groups: excavators, emergency responders, public officials and affected public communities served. UGI is a member of PAPA (Pipeline Association for Public Awareness), which performs safety awareness training to the affected public. UGI makes Web-based training available to emergency responders through a site called RTUJ. Responding to Utility Emergencies. UGI provides additional training programs in its web site called "A Shared View," that provides UGI specific natural gas safety information for emergency services personnel.</p> |
| <p>1.4 The U.S. Environmental Protection Agency's (EPA) Natural Gas STAR Program</p> <p>2. The entity shall describe how it integrates a culture of safety and emergency preparedness throughout its project lifecycles, such as through training, oversight of workforces, rules and guidelines for communicating risks, and use of technology</p> | <p>1.4 The U.S. Environmental Protection Agency's (EPA) Natural Gas STAR Program</p> <p>2. The entity shall describe how it integrates a culture of safety and emergency preparedness throughout its project lifecycles, such as through training, oversight of workforces, rules and guidelines for communicating risks, and use of technology</p> | <p>1.4 The U.S. Environmental Protection Agency's (EPA) Natural Gas STAR Program</p> <p>2. The entity shall describe how it integrates a culture of safety and emergency preparedness throughout its project lifecycles, such as through training, oversight of workforces, rules and guidelines for communicating risks, and use of technology</p> |
| <p>3. The entity shall describe its approach to ensuring pipeline operations are qualified or supervised when performing a covered task, including ongoing reviews of operator qualifications, assurance that unqualified workers are properly supervised, and efforts to maintain a sufficient number of qualified pipeline operators, where:</p> <p>3.1 Pipeline operators are defined as those people who engage in the transportation of gas, consistent with U.S. 49 CFR 192.1</p> | <p>From the genesis of a pipeline project to the end of its useful life, UGI requires that experienced and qualified individuals are involved throughout the lifecycle of a pipeline. UGI undergoes a multi-disciplinary review of pipeline designs that are ultimately reviewed by a licensed Professional Engineer. Designs also designate emergency that off valves for each respective project in the event of an emergency, and it is the expectation these valves are known and accessible to all individuals performing construction work. Pipeline construction also undergoes several inspection layers, ensuring safe and compliant construction practices. During a pipeline's life cycle, it will be inspected and maintained by qualified individuals to ensure reliability, and safe operating performance until the pipeline is decommissioned.</p> | <p>From the genesis of a pipeline project to the end of its useful life, UGI requires that experienced and qualified individuals are involved with a pipeline. UGI undergoes a multi-disciplinary review of pipeline designs that are ultimately reviewed by a licensed Professional Engineer. Designs also designate emergency that off valves for each respective project in the event of an emergency, and it is the expectation these valves are known and accessible to all individuals performing construction work. Pipeline construction also undergoes several inspection layers, ensuring safe and compliant construction practices. During a pipeline's life cycle, it will be inspected and maintained by qualified individuals to ensure reliability, and safe operating performance until the pipeline is decommissioned.</p> |
| <p>3.2 A pipeline operator is considered qualified to perform covered tasks when the individual has been evaluated, can perform the assigned covered task, and can recognize and react to abnormal operating conditions, consistent with the definition provided by U.S. 49 CFR 192.203.</p> | <p>UGI Utilities maintains a database of covered employees who require their operator qualifications be maintained and documented. Individuals who perform work on a pipeline are required to hold the appropriate covered task as defined in UGI's Gas Operations Manual (GOM), Section 8A.1A.10, <i>Operator Qualification (OQ)</i>.</p> <p>UGI Utilities trains and qualifies Company employees and contractors through testing and "hands-on" simulation as required by the PHMSA Operator Qualification (OQ) rule. UGI employees undergo multi-phase progressive training curriculum beginning with New Employee Orientation training and continuing through advanced training. To promote more uniform and hands on training, UGI completed the Learning Center in September of 2021. Its first class of new hires began on September 13, 2021. Additional training opportunities are increasing since the start up of the new facility.</p> | <p>UGI Utilities maintains a database of covered employees who require their operator qualifications be maintained and documented. Individuals who perform work on a pipeline are required to hold the appropriate covered task as defined in UGI's Gas Operations Manual (GOM), Section 8A.1A.10, <i>Operator Qualification (OQ)</i>.</p> <p>UGI Utilities trains and qualifies Company employees and contractors through testing and "hands-on" simulation as required by the PHMSA Operator Qualification (OQ) rule. UGI employees undergo multi-phase progressive training curriculum beginning with New Employee Orientation training and continuing through advanced training. To promote more uniform and hands on training, UGI completed the Learning Center in September of 2021. Its first class of new hires began on September 13, 2021.</p> |
| <p>3.2.1 A covered task is defined, consistent with U.S. 49 CFR 192.203, as an activity, identified by the operator, that is performed on a pipeline facility, at an operations or maintenance task, is performed as a requirement of maintaining regulatory compliance, and affects the operation or integrity of a pipeline.</p> | <p>UGI Utilities has identified over 140 covered tasks an individual could utilize in the field while performing routine work on or along the pipeline. These tasks are maintained and reviewed by the UGI OQ Committee to ensure the each task provides the appropriate instruction and requirements to perform the work safely. UGI is nearly completed aligning our tasks with an industry guide as described in ASME B31.0.</p> | <p>UGI Utilities has identified over 140 covered tasks an individual could utilize in the field while performing routine work on or along the pipeline. These tasks are maintained and reviewed by the UGI OQ Committee to ensure the each task provides the appropriate instruction and requirements to perform the work safely. UGI is nearly completed aligning our tasks with an industry guide as described in ASME B31.0.</p> |
| <p>4. The entity shall describe efforts to mitigate risks and promote emergency preparedness, such as coordinating with third parties (e.g., sewer line and buried power line developers), performing timely pipeline inspections, repairing aging infrastructure, and maintaining current pipeline operator certification.</p> | <p>UGI Utilities is an active participant in the Pennsylvania One Call and Maryland Miss Utility systems. UGI emphasizes the importance of utilizing and placing one call tickets to internal and external stakeholders when opportunities arise. Additionally, internal UGI procedures mandate inspection of higher risk pipelines in the event they are exposed or third party excavations are occurring on or near these pipelines. UGI develops communication channels with local townships and municipalities and other utilities in order to understand short term and long term road re-construction project and infrastructure replacement projects. Annual emergency response training is required for field operations personnel. Although a review and update of this training was planned in 2022, the update will be completed in 2023.</p> | <p>UGI Utilities is an active participant in the Pennsylvania One Call and Maryland Miss Utility systems. UGI emphasizes the importance of utilizing and placing one call tickets to internal and external stakeholders when opportunities arise. Additionally, internal UGI procedures mandate inspection of higher risk pipelines in the event they are exposed or third party excavations are occurring on or near these pipelines. UGI develops communication channels with local townships and municipalities and other utilities in order to understand short term and long term road re-construction project and infrastructure replacement projects. Annual emergency response training is required for field operations personnel. The training will be reviewed and updated during 2022.</p> |
| <p>5. The entity shall describe its efforts to manage risks related to human health and safety, and emissions, including fugitive emissions and process emissions, that arise out of the integrity of gas delivery infrastructure.</p> <p>5.1 Fugitive emissions are defined as natural gas (primarily methane) emissions resulting from leaks or other types of unintended or irregular releases.</p> <p>5.2 Process emissions are defined as natural gas emissions resulting from intentional releases.</p> <p>5.3 Disclosure shall include relevant strategies, plans, and/or targets related to reductions in fugitive emissions and process emissions, the entity's ability to measure such emissions, the activities and investments required to achieve the plans, and any risks or limiting factors that might affect achievement of the plans and/or targets.</p> | <p>Starting in 2019 UGI Utilities has set goals to reduce operational fugitive emissions by 35% and 55% by 2020 and 2041, respectively. The target goals will be achieved through the pipeline replacement program, infrared station surveys to detect leaks, and field surveys as part of the Natural Gas STAR Program. UGI is several years ahead of our commitment to replace all existing cast iron pipe by 2027 and all bare steel by 2041. In addition to pipe replacement, UGI is reviewing equipment that emits natural gas as part of its operation and identifying low zero emission replacements. The changes will be made as stations are rebuilt or construction of new facilities. Additionally, UGI has identified vendors to support the capture of pipeline blowdowns to reduce operational fugitive emissions. The implementation is expected to start in 2022. UGI is purchasing natural gas monitoring equipment to self-perform the surveys required under EPA Subpart W. It is proposed that UGI perform these surveys more frequently than the 5 year interval required in this EPA regulation.</p> | <p>Starting in 2019 UGI Utilities has set goals to reduce operational fugitive emissions by 35% and 55% by 2020 and 2041, respectively. The target goals will be achieved through the pipeline replacement program, infrared station surveys to detect leaks, and field surveys as part of the Natural Gas STAR Program. UGI is several years ahead of our commitment to replace all existing cast iron pipe by 2027 and all bare steel by 2041. In addition to pipe replacement, UGI is reviewing equipment that emits natural gas as part of its operation and identifying low zero emission replacements. The changes will be made as stations are rebuilt or construction of new facilities. Additionally, UGI has identified vendors to support the capture of pipeline blowdowns to reduce operational fugitive emissions. The implementation is expected to start in 2022. UGI is purchasing natural gas monitoring equipment to self-perform the surveys required under EPA Subpart W. It is proposed that UGI perform these surveys more frequently than the 5 year interval required in this EPA regulation.</p> |

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| <p>6. Disclosure may focus broadly on safety and emergency management systems, but shall specifically address operations in high consequence areas and the systems to avoid and manage emergencies, accidents, and incidents that could have catastrophic impacts on human health, the local community, and the environment.</p> | <p>UGI Utilities has a robust emergency training program tailored to a variety of stakeholders. For internal 1st Responders, UGI Utilities requires field employees and duty supervisors complete annual refresher training related to emergency response. Simulated emergency response events such as live demonstrations and hypothetical emergency drills are completed annually to better prepare our emergency responders in the event an emergency occurs. UGI Utilities provides an emergency response personnel complete incident command system (ICS) training to ensure an understanding of the ICS process in the event its implemented during an emergency. UGI Utilities also holds liaison meetings with affected stakeholders (public officials, residents, emergency responders, and excavators) annually at various locations where UGI Utilities serves natural gas. These liaison meetings educate stakeholders on gas leak recognition and response tactics, how to obtain assistance in the event of an emergency and a general understanding of the pipeline industry. This training is reviewed annually and has had improvements made in 2022 to strengthen the education of our employees in emergency response.</p> | <p>UGI Utilities has a robust emergency training program tailored to a variety of stakeholders. For internal 1st Responders, UGI Utilities requires field employees and duty supervisors complete annual refresher training related to emergency response. Simulated emergency response events such as live demonstrations and hypothetical emergency drills are completed annually to better prepare our emergency responders in the event an emergency occurs. UGI Utilities provides an emergency response personnel complete incident command system (ICS) training to ensure an understanding of the ICS process in the event its implemented during an emergency. UGI Utilities also holds liaison meetings with affected stakeholders (public officials, residents, emergency responders, and excavators) annually at various locations where UGI Utilities serves natural gas. These liaison meetings educate stakeholders on gas leak recognition and response tactics, how to obtain assistance in the event of an emergency and a general understanding of the pipeline industry. This training is reviewed annually and has had improvements made in 2022 to strengthen the education of our employees in emergency response.</p> | <p>UGI Utilities has a robust emergency training program tailored to a variety of stakeholders. For internal 1st Responders, UGI Utilities requires field employees and duty supervisors complete annual refresher training related to emergency response. Simulated emergency response events such as live demonstrations and hypothetical emergency drills are completed annually to better prepare our emergency responders in the event an emergency occurs. UGI Utilities provides and requires emergency response personnel complete incident command system (ICS) training to ensure an understanding of the ICS process in the event its implemented during an emergency. UGI Utilities also holds liaison meetings with affected stakeholders (public officials, residents, emergency responders, and excavators) annually at various locations where UGI Utilities serves natural gas. These liaison meetings educate stakeholders on gas leak recognition and response tactics, how to obtain assistance in the event of an emergency and a general understanding of the pipeline industry. UGI contracted with RTU-E – "Responding To Utility Emergencies" to develop an external facing curriculum that provides Emergency Management personnel the ability to track, test and certify in responding to Natural Gas & Electrical Utility emergencies at no cost to emergency responders. Upon request, UGI Utilities also performs a formal face to face Natural Gas or Electrical safety module conducted by UGI's Damage Prevention & Public Awareness Group or Electric Operators. UGI Utilities has also been an active participant in the natural gas industry's journey to developing and implementing pipeline management systems (PSMS). Presently, UGI Utilities is developing an plan for PSMS implementation at UGI.</p> |
| <p>7. The entity shall discuss direct or indirect financial opportunities related to the management of the integrity of gas delivery infrastructure, including but not limited to, improvements to stakeholder relations, opportunities for capital investments, reduction in customer rates through improved operational efficiency, and reduced risks of regulatory or civil fines or settlements.</p> | <p>UGI Utilities has an active pipeline replacement program in place aimed at eliminating non-contemporary pipe from its distribution system. Within these efforts, fiscal efficiencies are reviewed on a routine basis in order to identify cost saving measurements. UGI Utilities develops communication channels with local townships and municipalities across its service territory in order to understand short term and long term road re-construction projects. UGI actively attempts to plan pipeline replacement projects in line with municipal roadway plans and highway construction to reduce pipeline project costs. With the replacement of non-contemporary pipe with new pipelines, UGI is able to reduce the overall risk of its pipeline system. Contracts addressing pipeline construction, paving & restoration, and traffic control services are competitively bid on a 3 year cycle.</p> | <p>UGI Utilities has an active pipeline replacement program in place aimed at eliminating non-contemporary pipe from its distribution system. Within these efforts, fiscal efficiencies are reviewed on a constant basis in order to identify cost saving measurements. UGI Utilities develops communication channels with local townships and municipalities across its service territory in order to understand short term and long term road re-construction projects. UGI actively attempts to plan pipeline replacement projects in line with municipal roadway plans and highway construction to reduce pipeline project costs. With the replacement of non-contemporary pipe with new pipelines, UGI is able to reduce the overall risk of its pipeline system.</p> | <p>UGI Utilities has an active pipeline replacement program in place aimed at eliminating non-contemporary pipe from its distribution system. Within these efforts, fiscal efficiencies are reviewed on a constant basis in order to identify cost saving measurements. UGI Utilities develops communication channels with local townships and municipalities across its service territory in order to understand short term and long term road re-construction projects. UGI actively attempts to plan pipeline replacement projects in line with municipal roadway plans and highway construction to reduce pipeline project costs. With the replacement of non-contemporary pipe with new pipelines, UGI is able to reduce the overall risk of its pipeline system.</p> |
| <p>8. The entity may disclose the following:</p> | | | |
| <p>8.1 Pipeline replacement rates</p> | <p>UGI replaces 66-70 miles of cast iron and bare steel/wrought iron main per year. UGI has committed to fully replace its cast iron system by 2027. UGI is currently ahead of schedule on this commitment and is positioned to complete this work by the end of 2025.</p> | <p>UGI replaces 66-70 miles of cast iron and bare steel/wrought iron main per year. UGI has committed to fully replace its cast iron system by 2027. UGI is currently ahead of schedule on this commitment and is positioned to complete this work by the end of 2025.</p> | <p>UGI replaces 66-70 miles of cast iron and bare steel/wrought iron main per year. UGI has committed to fully replace its cast iron system by 2027. UGI is currently ahead of schedule on this commitment and is positioned to complete this work by the end of 2025.</p> |
| <p>8.2 Average response time for gas emergencies</p> | <p>On a fiscal basis, UGI Utilities response time to an emergency was an average of 22.4 minutes in 2022. UGI Utilities employees responded to an emergency within 60 minutes 99.7% of the time and within 45 minutes 98.3% of the time. This response rate is attributed to collaboration between the field resources and our dispatchers as well as our Emergency Response Improvement Team (ERIT) activities.</p> | <p>On a fiscal basis, UGI Utilities response time to an emergency was an average of 20.1 minutes in 2021. UGI Utilities employees responded to an emergency within 60 minutes 99.8% of the time and within 45 minutes 98.4% of the time. This response rate is attributed to collaboration between the field resources and our dispatchers.</p> | <p>On a fiscal basis, UGI Utilities response time to an emergency was an average of 20.9 minutes in 2020. UGI Utilities employees responded to an emergency within 60 minutes 99.9% of the time and within 45 minutes 98.9% of the time. This response rate is attributed to collaboration between the field resources and our dispatchers.</p> |
| <p>8.3 Open Grade 2 and 2+ leaks</p> | <p>UGI Utilities had a total of 108 open Grade 2 leaks for the fiscal year ending September 30, 2022. This signifies a 52% decrease in open Grade leaks when compared to 2016 leak data.</p> | <p>UGI Utilities had a total of 208 open Grade 2 leaks for the fiscal year ending September 30, 2021. This signifies a 43% decrease in open Grade leaks when compared to 2016 leak data.</p> | <p>UGI Utilities had a total of 242 open Grade 2 leaks for the fiscal year ending September 30, 2020. This signifies a 70% decrease in open Grade 2 leaks when compared to 2015 leak data.</p> |
| <p>8.4 Negative emissions, including the technologies it employs to measure leakage, the amount of leakage calculated according to each technique it employs, and the regulations to which its gas leakage is subject.</p> | <p>UGI Utilities uses an array of leak survey techniques including conventional flame ionization surveys, infrared, and laser (MIDL) remote methane leak detectors). UGI Utilities has recently acquired and implemented new, highly sensitive (PPH) leak detection technology - IGR On Axis Integrated Cavity Output Spectroscopy (IA-ICOS) - Heath Mobile Guard. This implementation is intended to improve the emissions from the UGI system by detecting by facilitating the detection and repair of leaks well below previously detectable levels. Additional infra red units are proposed for purchase in 2022 that will assist in more frequent inspections of measurement and regulation stations required to be surveyed under EPA's Subpart W.</p> | <p>UGI Utilities uses an array of leak survey techniques including conventional flame ionization surveys, infrared, and laser (MIDL) remote methane leak detectors). UGI Utilities has recently acquired and implemented new, highly sensitive (PPH) leak detection technology - IGR On Axis Integrated Cavity Output Spectroscopy (IA-ICOS) - Heath Mobile Guard. This implementation is intended to improve the emissions from the UGI system by detecting by facilitating the detection and repair of leaks well below previously detectable levels. Additional infra red units are proposed for purchase in 2022 that will assist in more frequent inspections of measurement and regulation stations required to be surveyed under EPA's Subpart W.</p> | <p>UGI Utilities uses an array of leak survey techniques including conventional flame ionization surveys, infrared, and laser (MIDL) remote methane leak detectors). UGI Utilities has recently acquired and implemented new, highly sensitive (PPH) leak detection technology - IGR On Axis Integrated Cavity Output Spectroscopy (IA-ICOS) - Heath Mobile Guard. This implementation is intended to improve the emissions from the UGI system by detecting by facilitating the detection and repair of leaks well below previously detectable levels.</p> |
| <p>8.5 Process emissions</p> | <p>UGI Utilities performs annual infra-red leak surveys on a sample of transmission-distribution regulator stations pursuant to 40 CFR 88 Subpart W. These reports are filed annually with the EPA and consist of 20% of the T and D regulator stations in the UGI distribution system. Planning is underway to do more frequent surveys of these facilities starting in 2022.</p> | <p>UGI Utilities performs annual infra-red leak surveys on a sample of transmission-distribution regulator stations pursuant to 40 CFR 88 Subpart W. These reports are filed annually with the EPA and consist of 20% of the T and D regulator stations in the UGI distribution system. Planning is underway to do more frequent surveys of these facilities starting in 2022.</p> | <p>UGI Utilities performs annual infra-red leak surveys on a sample of transmission-distribution regulator stations pursuant to 40 CFR 88 Subpart W. These reports are filed annually with the EPA and consist of 20% of the T and D regulator stations in the UGI distribution system. Planning is underway to do more frequent surveys of these facilities starting in 2022.</p> |
| <p>8.6 Other efforts designed to reduce emissions and/or improve the safety of its gas delivery infrastructure</p> | <p>UGI Utilities is reviewing all potential emissions sources and developing a plan to reduce significant sources of emissions in the future. A large effort on replacing vintage pipeline (cast iron and bare steel) continues. This represents a major source of emissions from distribution pipeline. Increased leak surveys and use of state of the art detection equipment has started and will continue as UGI Utilities focuses on methane emissions. Other programs being improved are emergency response time and increase in education concerning the 811 program (call before you dig). Increase in the public outreach is expected to create more awareness of subsurface utilities and increase rate of those digging to notify the location and planned dig dates through the PA One call system.</p> | <p>Through UGI's pipeline replacement program, we have reduced the number of hazardous leaks by 42% since 2015. UGI has emergency response goals to gauge the efficient response of emergency responders to odor or gas or other emergency calls. In 2021 UGI implemented fleetHIT. This vehicle based GPS system tracks each UGI vehicle and allows the dispatchers to see the closest employees that can respond to the call. UGI reviews and determines a root cause for each pipeline hit in the system. A team is called in that includes those responsible for the damage and reviews the circumstances around the line strike. A root cause is then determined and recorded in the PA One Call database. Information from these reviews is used to improve the line location process and property protection processes.</p> | <p>Through UGI's pipeline replacement program, we have reduced the number of hazardous leaks by 44% since 2015.</p> |