



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com
February 12, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division,
Docket No. R-2015-2518438; **PETITION TO INTERVENE OF THE
NATURAL GAS SUPPLIER PARTIES**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of the Natural Gas Supplier Parties in the above-captioned proceedings. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
*Counsel for Dominion Retail, Inc. d/b/a
Dominion Energy Solutions, Shipley Group,
LLC d/b/a Shipley Energy, Interstate Gas
Supply, Inc. d/b/a IGS Energy, AMERIGreen
Energy, and Rhoads Energy*

TSS/jld
Enclosure

cc: Administrative Law Judge Susan D. Colwell (via email and regular mail)
Administrative Law Judge Steven K. Haas (via email and regular mail)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

The Honorable Susan D. Colwell
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3261
scolwell@pa.gov

The Honorable Steven K. Haas
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3261
sthaas@pa.gov

Christopher T. Wright, Esquire
Garrett P. Lent, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
cwright@postschell.com
glent@postschell.com
Counsel for UGI Utilities, Inc. – Gas Division

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com
Counsel for UGI Utilities, Inc. – Gas Division

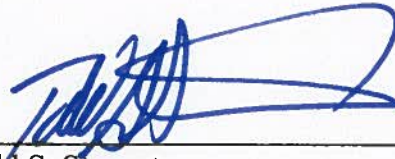
Darryl Lawrence, Esquire
Lauren Burge, Esquire
Amy Hirakis, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org
lburge@paoca.org
ahirakis@paoca.org

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 202
Harrisburg, PA 17101
sgray@pa.gov

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
sgranger@pa.gov

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for Commission on Economic Opportunity

Kent D. Murphy, Esquire
Mark Morrow, Esquire
Danielle Jouenne, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
murphyke@ugicorp.com
morrowm@ugicorp.com
jouenned@ugicorp.com
Counsel for UGI Utilities, Inc. – Gas Division



Todd S. Stewart

DATED: February 12, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2015-2518438
	:	
UGI Utilities, Inc. – Gas Division	:	

**PETITION TO INTERVENE
OF THE NATURAL GAS SUPPLIER PARTIES**

NOW COME Dominion Retail, Inc. d/b/a Dominion Energy Solutions (“DES”), Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”), Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”), AMERIGreen Energy, and Rhoads Energy (“Rhoads”) (collectively, “NGS Parties”) by and through their counsel, Hawke McKeon & Sniscak, LLP, and hereby petition to intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71 *et. seq.* In support of their Petition to Intervene, the NGS Parties state and aver as follows:

1. On or about January 19, 2016, UGI Utilities, Inc. (UGI Utilities) filed Tariff Gas – PA. P.U.C. Nos. 6 and 6-S, that unless otherwise suspended by the Pennsylvania Public Utility Commission (“Commission”) would have become effective March 19, 2016. These filings seek a general rate increase calculated to produce \$58.6 million (17.5%) in additional annual revenues. By Order entered February 11, 2016, the Commission suspended the effective dates of the filings and sent the matter to the Office of Administrative Law Judge for hearings.

2. The NGS Parties are all natural gas suppliers (“NGS”) and are all licensed to provide natural gas supply service within the service territory of UGI Utilities, Inc. – Gas Division (“UGI”).

3. The NGS Parties are represented in the above-captioned matter by the following counsel. Please serve counsel with all documents filed and served in this case, to date.

Todd S. Stewart (Attorney ID # 75556)
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
717.236.1300 (voice)
717.236.4841 (fax)

4. As suppliers of natural gas within the UGI service territory, the NGS Parties have a unique, direct, immediate and substantial interest in the outcome of this proceeding and will be bound by any Commission decision rendered regarding the matters at issue. In particular, UGI in this proceeding seeks to adjust the gas procurement charge, and also seeks to adjust the commercial merchant function charge rider. In addition, there are a number of competitive industry issues that the NGS Parties intend to raise in the above-captioned proceeding.

5. The NGS Parties are continuing to review the filing and plan to serve discovery request to further explore the potential issues which will impact the competitive market. They reserve the right to raise and address these issues in this proceeding.

6. The NGS Parties have standing to participate in this matter in accordance with the requirements of 52 Pa. Code §5.71, et seq., as their interest is substantial and will be directly affected by the outcome of this proceeding.

WHEREFORE, the NGS Parties respectfully request that their Petition to Intervene be granted and that they be afforded full party status in this matter.

Respectively submitted,



Todd S. Stewart, PA Attorney I.D. # 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
717.236.1300 (voice)
717.236.4841 (fax)

*Counsel for Dominion Retail, Inc. d/b/a
Dominion Energy Solutions, Shipley Group,
LLC d/b/a Shipley Energy, Interstate Gas
Supply, Inc. d/b/a IGS Energy, AMERIGreen
Energy, and Rhoads Energy*

DATED: February 12, 2016