

March 15, 2019

### Via Electronic Filing

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

RE: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division

Docket No. R-2018-3006814

## Petition to Intervene of UGI Energy Services, LLC

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission please find the Petition to Intervene of UGI Energy Services, LLC ("UGIES") in the above-captioned proceeding. Copies of this Petition are being served this date, in accordance with the attached Certificate of Service.

Please contact me at (610) 768-3625 if you have any questions with respect to this matter.

Very truly yours,

Fruk H. Mark

Frank H. Markle Senior Counsel UGI Corporation

Attorney for UGI Energy Services, LLC

**Enclosure** 

cc: Certificate of Service

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utilities Commission :

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v. : Docket No. R-2018-3006814

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UGI Utilities, Inc. – Gas Division

# PETITION TO INTERVENE OF UGI ENERGY SERVICES, LLC

UGI Energy Services, LLC ("UGI Energy"), hereby petitions to intervene pursuant to 52 Pa. Code §§ 5.71-5.75 in the above-captioned proceeding filed on behalf of UGI Utilities, Inc. – Gas Division ("UGIU") In support of this Petition, UGI Energy states as follows:

- 1. On January 29, 2019, UGIU filed Supplement No. 267 to its Pennsylvania Public Utility Commission Gas Tariff. In this filing, UGIU proposed to increase rates by approximately \$71.1 million and proposed various changes to its tariff rules.
- 2. UGI Energy is a Pennsylvania limited liability company with a business address of. One Meridian Boulevard, Suite 2C01, Wyomissing, Pennsylvania 19610.
- 3. UGI Energy is a licensed natural gas supplier in Pennsylvania at Docket No. A-2013-2369286. UGI Energy is licensed as an aggregator, broker/marketer and supplier of natural gas services to residential, commercial, industrial and governmental customers in Pennsylvania, including in UGIU's service territories.
  - 4. The names, address and telephone number of counsel for UGI Energy are:

Frank H. Markle UGI Corporation 460 North Gulph Road King of Prussia, Pennsylvania 19406 (610) 768-3625

Fax: (610) 992-3209 marklef@ugicorp.com

Correspondence and Communications in this proceeding should also be directed to:

David Lindenmuth
Director – Marketing
UGI Energy Services, Inc.
One Meridian Blvd., Suite 2C01
Wyomissing, PA 19610
(610) 373-7999

Fax: (610) 374-4288

- 5. Eligibility to intervene in Commission proceedings is governed by the Commission's rule at 52 Pa. Code § 5.72. Under Section 5.72, a "right or interest" sufficient to warrant intervention includes an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding; or, another interest of such nature that participation of the petitioner may be in the public interest.
- 6. UGI Energy has direct and substantial interest in this proceeding that cannot be adequately represented by any other party. As a licensed natural gas supplier in Pennsylvania serving customers on the UGIU system, UGI Energy has a direct interest in determining that the changes transportation rules proposed by UGIU are in the public interest and will not adversely impact UGI Energy's ability to meet its existing and future service obligations to retail customers on the UGIU system. Thus UGI Energy satisfies the requirements for intervention set forth in 52 Pa. Code §52.72(a), because it has an

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interest in the proceeding which may be directly affected and which is not adequately

represented by existing participants.

WHEREFORE, for the foregoing reasons, UGI Energy Services, Inc. respectfully

requests that its Petition to Intervene be granted and that the Commission grant it full

rights as a party to this proceeding, together with such other relief as is just and

reasonable under the circumstances.

Respectfully submitted,

Frank H. Markle, Esq.

**UGI** Corporation

460 North Gulph Road

King of Prussia, PA 19406

(610) 768-3625

Attorney for UGI Energy Services, LLC

Dated: March 15, 2019

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### BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utilities Commission

Docket No. R-2018-3006814

UGI Utilities, Inc. - Gas Division

V.

#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached Motion to Intervene on the following parties in accordance with the requirements of 52 Pa. Code §1.54 et seq. (relating to service by a participant).

### VIA FIRST-CLASS MAIL

David B. MacGregor, Esq. Post @ Schell, PC Four Penn Center 1600 John F. Kennedy Blvd. Philadelphia, PA 19103-2808

1 UGI Drive

Denver, PA 17517

Paul J. Szykman, VP UGI Utilities, Inc.

Christine M. Appleby, Esq. Lauren M. Burge, Esq.

David T. Evard, Esq. Darryl A. Lawrence, Esq.

Office of Consumer Advocate 555 Walnut Street 5<sup>th</sup> Floor Forum Place

Harrisburg, PA 17101-1923

Joseph L. Vullo, Esq. 1460 Wyoming Avenue Forty Fort, PA 18704

Kent D. Murphy, Esq. Mark C. Morrow, ESO. Danielle Jouenne, Esq. **UGI** Corporation 460 North Gulph Road

King of Prussia, Pennsylvania 19406

Jessica R. Rogers, Esq. Garrett P. Lent, Esq.

Post & Schell

17 North Second Street

12<sup>th</sup> Floor

Harrisburg, PA 17101-1601

Stephen C. Gray, Esq.

Office of Small Business Advocate 300 North Second Street, Suite 1102

Harrisburg, PA 17101-1303

Ira H. Weinstock, Esq. 800 North Second Street Harrisburg, PA 17101-1601 Daniel Clearfield, Esq. Kristin Marsilio, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street 9<sup>th</sup> Floor, P.O. Box 865 Harrisburg, PA 17101

Keith P. Dolon 501 Carleton, Avenue Hazelton, PA 18201

Scott B. Granger, Esq.
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2<sup>nd</sup> Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265

Todd Stewart, Esq. Hawke McKeon & Sniscak, LLP 100 North Tenth St., P.O. Box 1778 Harrisburg, PA 17105

Gail L. Hoffer Bernadette Margel 594 Royer Drive Lancaster, PA 17601-5186

Vasiliki Karandrikas, Esq. Pamela C. Polacek, Esq. Allesandra L. Hylander, Esq. McNees Wallace & Nurick P.O. Box 1166 100 Pine Street Harrisburg, PA 17108-1166

Frank H. Markle, Esq. UGI Corporation

460 North Gulph Road King of Prussia, PA 19406

(610) 337-1000

Counsel for UGI Energy Services, Inc.

Dated: March 15, 2019