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March 3, 2022

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120

Re: **Petition of ChargeVC-PA to Initiate a Proceeding to Issue a Policy
Statement on Electric Utility Rate Design for Electric Vehicle Charging
Docket No. P-2022-3030743**

Dear Secretary Chiavetta:

On behalf of UGI Utilities, Inc. – Electric Division (“UGI Electric” or the “Company”), enclosed for filing is a Petition to Intervene in the above-referenced proceeding.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

Timothy K. McHugh
Counsel – Energy & Regulation
UGI Corporation

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of ChargeVC-PA to Initiate a Proceeding to Consider Issuance of a Policy Statement on Electric Utility Rate Design for Electric Vehicle Charging : : Docket No. P-2022-3030743

**PETITION TO INTERVENE OF
UGI UTILITIES, INC. – ELECTRIC DIVISION**

To the Honorable Pennsylvania Public Utility Commission:

Pursuant to Sections 5.71 through 5.76 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 5.71-5.76, UGI Utilities, Inc. – Electric Division (“UGI Electric” or the “Company”) hereby files this Petition to Intervene in the above-captioned proceeding in response to ChargeVC-PA’s Petition to Initiate a Proceeding to Consider Issuance of a Policy Statement on Electric Utility Rate Design for Electric Vehicle Charging (“Petition”). In its Petition, ChargeVC-PA requested that the Commission issue a policy statement addressing the rate design to be applied by electric utilities in order to encourage the efficient inclusion of electric vehicles. Should this request be granted, a resulting policy statement may directly affect the business operations, rates, and customers of UGI Electric. For this reason, UGI Electric seeks to intervene and participate in the Commission’s investigation of the Petition.

In support of its Petition to Intervene, UGI Electric states as follows:

I. INTRODUCTION

1. UGI Electric is a division of UGI Utilities, Inc. (“UGI Utilities”), a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, and a

wholly owned subsidiary of UGI Corporation. UGI Electric primarily provides electric distribution service to approximately 63,000 customers in Luzerne and Wyoming counties in Northeastern Pennsylvania, pursuant to certificates of public convenience granted by the Commission. UGI Electric is a “public utility” and an “electric distribution company” (“EDC”) within the meaning of Sections 102 and 2803 of the Public Utility Code, 66 Pa.C.S. § 102 and § 2803, subject to the regulatory jurisdiction of the Commission.

2. UGI Electric’s full name and business address is as follows:

UGI Utilities, Inc. – Electric Division
1 UGI Drive
Denver, PA 17517

3. The names, addresses, and contact information for UGI Electric’s

attorneys are:

Michael S. Swerling (ID #94748)
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UGI Electric respectfully requests that all correspondence from the Commission in this proceeding be directed to UGI Electric’s attorneys.

4. On February 4, 2022, ChargeVC-PA filed its Petition requesting that the Commission initiate a proceeding to consider issuing a policy statement regarding electric vehicle charging in the Commonwealth. More specifically, ChargeVC-PA requested that the Commission issue a policy statement addressing the issue of the appropriate rate design for electric vehicle charging.

5. On February 25, 2022, the Commission issued a Secretarial Letter requesting that interested parties file Comments to ChargeVC-PA's Petition by the close of business on April 11, 2022. Thereafter, reply comments must be filed by the close of business on May 11, 2022.

II. STANDARDS FOR INTERVENTION

6. Sections 5.71-5.76 of the Commission's regulations, 52 Pa. Code §§ 5.71-5.76, set forth the Commission's standards and requirements for a party to intervene in a proceeding before the Commission.

7. More specifically, Section 5.72 of the Commission's regulations, 52 Pa. Code § 5.72, specifies, in part, that:

(a) Persons. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

(2) 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.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

52 Pa. Code § 5.72. The eligibility requirements for an interested party to intervene in an action before the Commission are less strict and easier to satisfy than the common law standard for intervention. *See Application of Metropolitan Edison Co. for Approval to Construct an Electric Generating Unit Fueled by Natural Gas*, Docket No. A-110300, 1994 Pa. PUC LEXIS 52 (Order entered Feb. 25, 1994) (citing *William Penn Parking Garage, Inc. v. City of Pittsburgh*, 464 Pa. 168, 346 A.2d 269 (1975)).

III. UGI ELECTRIC'S RIGHT TO INTERVENE

8. As an EDC, UGI Electric has a significant interest in participating in this proceeding because, should ChargeEVC-PA's request be granted, it may directly affect UGI Electric's business operations, rates, and customers.

9. In its Petition, ChargeEVC-PA requests that the Commission initiate a proceeding that will culminate with the issuance of a Policy Statement addressing rate design for electric vehicle charging in the Commonwealth. (*See* Petition pgs. 17-18). Such a request may require UGI Electric to revise its Commission-approved tariff to incorporate specific rates for electric vehicle charging. UGI Electric intends to provide its input and recommendations regarding this policy inquiry, and the impact it may have on its customers and its service territory.

10. Furthermore, while UGI Electric agrees that rate design is an important component of facilitating the efficient adoption and integration of electric vehicles, limiting this proceeding to rate design would omit a wide range of issues that the Commission should consider in determining how to encourage and effectively advance electric vehicle adoption and prepare appropriately for the impacts from the market development of electric vehicles in the Commonwealth.

11. While other EDCs in the Commonwealth may have similar concerns, no other participant can adequately represent the interest of UGI Electric and its customers in this proceeding.

12. As such, UGI Electric should be permitted to intervene in this proceeding.

IV. CONCLUSION

WHEREFORE, UGI Electric respectfully requests that the Honorable Commission grant this Petition to Intervene and allow UGI Electric to participate in the above-captioned matter.

Respectfully submitted,



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CERTIFICATE OF SERVICE

Petition of ChargeVC-PA to Initiate a :
Proceeding to Consider Issuance of a Policy :
Statement on Electric Utility Rate Design : Docket No. P-2022-3030743
for Electric Vehicle Charging :

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

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Date: March 3, 2022



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