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File #: 153583

May 12, 2014

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

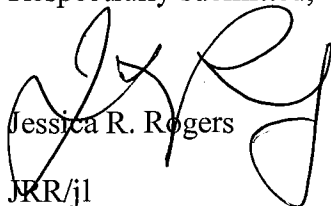
**Re: Petition of UGI Utilities, Inc. for Approval of its Long-Term Infrastructure Improvement Plan - Docket No. P-2013-2398833**

Dear Secretary Chiavetta:

Enclosed for filing is the response of UGI Utilities, Inc. – Gas Division to the Bureau of Technical Utility Services Data Request – Question No. 17, for the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Jessica R. Rogers

JRR/jl

Enclosures

cc: Certificate of Service  
Yasmin Snowberger (*via email*)

**CERTIFICATE OF SERVICE**

**UGI Utilities, Inc. – Gas Division  
(Docket No. P-2013-2398833)**

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 E-MAIL AND FIRST CLASS MAIL**

Johnnie Simms  
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*UGI Industrial Intervenors*

Erin L. Gannon  
Brandon J. Pierce  
Office of Consumer Advocate  
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Steven C. Gray  
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Harrisburg, PA 17101

**VIA FIRST CLASS MAIL**

Birch, Horton, Bittner and Cherot  
Suite 1200  
1155 Connecticut Avenue, NW  
Washington, DC 20036  
*Alumax Mill Products, Inc.*

Date: May 12, 2014

  
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Jessica R. Rogers

UGI Utilities, Inc. - Gas Division  
Docket No. P-2013-2398833  
Long Term Infrastructure Improvement Plan  
Responses to TUS Set III Data Requests  
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Question 1

Request:

In an earlier data request, UGI-GD was asked in Item P-2 to "Please provide a detailed description of UGI-GD's outreach and coordination activities with other utilities, PennDOT and local governments on planned maintenance/construction projects as directed in the Commission's proposed rulemaking at L-2012-2317274. Page 33 of the LTIIP provides a brief description of UGI's outreach, but lacks detail. Please provide more detail — how is the outreach coordinated, how many and type of personnel, who do they report to, how often do they meet, etc."

However, UGI-GD's response to P-2 did not adequately answer the question. UGI-GD's response to P-2 did not address how UGI-GD coordinates leakage surveys with other entities where UGI-GD equipment may be present. UGI-GD's response to P-2 also did not identify the UGI-GD personnel responsible for coordination activities.

Specifically, please provide additional detail on UGI-GD's outreach and coordination activities with other entities, such as highway-related agencies, water authorities/utilities, and municipalities. Please address how UGI-GD focuses leakage surveys on areas where soil or pavement has been disturbed by excavation activities especially due to work by these other entities. Please discuss how UGI-GD coordinates leakage surveys with these entities, for areas where evidence of water leaks, sinkholes, or instability in the road exists. Please identify by title, the UGI-GD personnel responsible for coordination activities.

Response:

UGI performs significant efforts to coordinate operations and maintenance activities with other infrastructure owners including highway agencies, water / sewer authorities, and municipalities. In addition to the outreach and coordination efforts described in response to P-2, as a registered infrastructure owner in the Pennsylvania One-Call System, UGI is notified of planned work which may impact utility facilities. As part of the design and planning process, engineering consulting firms and infrastructure owners utilize Design Notices to provide UGI with advance pre-construction notification of projects which may impact utility infrastructure. In response to Design Notices, UGI is alerted to project plans and provides detailed information to support infrastructure coordination efforts. Design Notices have proven useful in identifying and resolving potential utility conflicts in advance of field construction. Additionally, Design Notices have alerted UGI to

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Question 1 (Continued)

projects where accelerated replacement of gas infrastructure afforded the ability to minimize future restoration costs. For example, UGI recently coordinated infrastructure relocations with United American Water on a project along Second Street in Wormleysburg. Personnel involved in the review of One-Call Design Notices include but are not limited to Area Manager Engineering, Staff Engineer, Project Engineer, Engineering Technician, Engineer II, Engineer I.

UGI also coordinates operation and maintenance activity with water and sewer entities. Water and sewer issues may create the potential for subsidence or creation of sink-holes, which can remove the support for adjacent utilities. Whether identified through routine system surveillance, or in response to reports of subsidence received from municipal authorities or water / sewer utilities, UGI takes additional steps to ensure infrastructure integrity by performing additional leak surveys of affected facilities, providing inspection and monitoring during sink hole repairs, temporarily de-pressurizing lines subjected to instability, and relocating lines away from areas of subsidence. For example, due to a series of water main breaks along South 14th Street, in Harrisburg, UGI has initiated a replacement project to eliminate a section of cast iron main which may be subjected to future subsidence should the breaks continue. In addition to these efforts, UGI records the presence of sink-holes or subsidence in a Geographic Information System to facilitate data integration for risk analysis. Personnel involved in these coordination activities include but are not limited to Area Manager Engineering, Staff Engineer, Project Engineer, Operations Superintendent, Operations Supervisor, and Leak Survey Coordinator.

With respect to state, municipal, and local highway and transportation agencies, UGI engages in significant coordination efforts. On an annual basis, UGI performs outreach to roadway authorities to identify planned roadway resurfacing and reconstruction projects. Template letters are issued to highway stakeholders to gather information to better coordinate and align utility infrastructure replacement projects with transportation infrastructure plans. By aligning plans and adjusting project schedules as may be necessary, roadway resurfacing costs and repeated community disturbance may be minimized. In addition to the written outreach, periodic meetings are held with governmental officials to identify changes in project plans and to coordinate the efforts on major projects. UGI Engineering Staff has held follow-up meetings or discussions with larger municipalities including Allentown, Bethlehem, Carlisle, Easton, Harrisburg, Lancaster, Lebanon, and Reading among others. Additionally, UGI coordinates with PennDOT in a similar manner and actively participates in the Utility Highway Liaison Committee meetings to enhance project communication and infrastructure planning. The UHLC is comprised of representatives of all the utility companies in Pennsylvania, each of the eleven (11) PennDOT Engineering Districts and the PennDOT Central Office

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Question 1 (Continued)

Bureaus including the Office of Chief Counsel and bureaus responsible for utility design, relocation, permitting and related matters in the Commonwealth. A primary mission of the committee is to provide a forum for open discussion of issues, challenges and opportunities and to foster an enhanced atmosphere of cooperation between the Commonwealth utility companies and PennDOT. In the communities of Allentown and Bethlehem, UGI utilizes an internet based tool, Envista, to facilitate project coordination and planning. Personnel involved in these coordination activities include but are not limited to Area Manager Engineering, Staff Engineer, Project Engineer, Engineering Technician, Engineer II, Engineer I.

Prepared by or under the supervision of: Hans Bell