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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; **PREHEARING CONFERENCE**
MEMORANDUM OF THE NATURAL GAS SUPPLIER PARTIES

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of the Natural Gas Supplier Parties in the above-captioned proceedings. Copies of this Memorandum 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
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Todd S. Stewart

DATED: February 12, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

UGI Utilities, Inc. – Gas Division

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Docket No. R-2015-2518438

**PREHEARING CONFERENCE MEMORANDUM
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 submit this prehearing conference memorandum in compliance with the Presiding Administrative Law Judges’ Prehearing Order dated February 4, 2016. A Prehearing Conference in this matter is currently scheduled to be held on Wednesday, February 17, 2016 at 10:00 A.M.

I. PROCEDURAL HISTORY

1. On or about January 19, 2016, UGI Utilities, Inc. – Gas Division (“UGI”) filed a request to increase its rates in the above-captioned matter.
2. Through their Petition to Intervene, filed simultaneously herewith, the NGS Parties have requested to be granted full party status in this matter.

3. The NGS Parties are represented in the above-captioned matter by the counsel listed below. For purposes of the service list, the below-listed counsel should be listed. The NGS Parties request to receive only a single copy of all documents filed by hard copy in this matter:

Todd S. Stewart (Attorney ID # 75556)
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II. PUBLIC INPUT HEARINGS

4. The NGS Parties do not offer any opinion on whether public input hearings are necessary and should be held in this matter, but only suggest that due to the rather lengthy time period since UGI's last rate case, it may be worthwhile to consider such input hearings, if only for the education of the public.

III. DISCOVERY MODIFICATIONS

5. The NGS Parties are amenable to the typical discovery modifications offered by the Office of Consumer Advocate in proceedings of this type. In particular, the NGS Parties suggest that the Presiding Administrative Law Judges require that any document filed after 12:00 P.M. on a Friday or the day before a holiday, be considered to be filed on the next business day for purposes of any response due thereto. The NGS Parties also suggest that for a document be considered timely served, that it may be served electronically by close of business, 4:30 p.m., to be followed by a hard copy delivered by first class mail.

IV. ISSUES AND WITNESSES

6. The NGS Parties intend to present issues in this matter that are related to the competitive market in the UGI service territory, and relevant tariff rules that impact an NGS' ability to operate in the service territory, including UGI's proposal to reduce the gas procurement charge, as well as other tariff changes including financial security requirements. The NGS Parties also intend to address such issues as calculation of capacity obligations, storage assignment, and other operational issues. The NGS Parties continue to review the filing and reserve the right to raise additional issues at the appropriate time, as they see fit.

7. The NGS Parties intend to submit the testimony of at least one witness in this case, but have not yet ascertained the identity of said witness(es). The NGS Parties will notify Your Honors and the other Parties at the earliest possible juncture of the identity of their witnesses.

V. SCHEDULE

8. The NGS Parties have not developed their own litigation schedule for this matter, but will work cooperatively with the other Parties to this proceeding to develop a schedule acceptable to all Parties and Your Honors.

VI. SETTLEMENT

9. The NGS Parties are willing to engage in discussions of settlement at the appropriate juncture in this matter and will work cooperatively with the other Parties to determine whether settlement is feasible.

WHEREFORE, the NGS Parties hereby respectfully submit their Prehearing Conference Memorandum in the above-captioned matter.

Respectively submitted,



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Supply, Inc. d/b/a IGS Energy, AMERIGreen
Energy, and Rhoads Energy*

DATED: February 12, 2016