

COMMONWEALTH OF PENNSYLVANIA



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June 30, 2016

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Statement in Support of the Joint Petition for Settlement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Amy E. Hirakis
Amy E. Hirakis
Assistant Consumer Advocate
PA Attorney I.D. #310094

Enclosures

cc: Honorable Susan D. Colwell, ALJ
Certificate of Service

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operating revenues at present rates. Under the Company's proposed increase, the monthly bill of a residential customer using 57.3 ccf per month would increase from \$51.77 to \$61.97 per month, or by 19.7%. UGI also proposed to increase the residential customer charge from \$8.55 to \$17.50 per month. UGI provides natural gas service to approximately 388,000 residential, commercial, and industrial customers in portions of 16 counties throughout Pennsylvania.

On February 2, 2016, the OCA filed a Formal Complaint and Public Statement. The following other parties filed either a Petition to Intervene or Formal Complaint in this proceeding: the Office of Small Business Advocate (OSBA); the Commission on Economic Opportunity (CEO); the UGI Industrial Intervenors (UGIII); the Retail Energy Supply Association (RESA); the NGS Parties¹; and the Coalition for Affordable Utility Services and Energy-Efficiency in Pennsylvania (CAUSE-PA). On February 1, 2016, the Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. Additionally, three (3) residential consumers filed Formal Complaints against UGI's requested rate increase.

The proceeding was assigned to Administrative Law Judge Susan D. Colwell. By Order entered February 11, 2016, the Commission suspended the implementation of Tariff Gas – PA. P.U.C. Nos. 6 and 6-S until October 19, 2016, and instituted an investigation into the lawfulness, justness, and reasonableness of the rates, rules, and regulations proposed in Tariff Gas – PA. P.U.C. Nos. 6 and 6-S. A prehearing conference was held on February 17, 2016, and a litigation schedule was adopted. Additionally, three public input hearings were held in the Company's service territory – two in Harrisburg, Pennsylvania and one in Allentown, Pennsylvania.

The OCA conducted extensive discovery and submitted the testimony of the following witnesses in this proceeding:

¹ The NGS Parties consist of Dominion Retail, Inc. d/b/a Dominion Energy Solutions, Shipley Energy Choice, LLC d/b/a Shipley Energy, Interstate Gas Supply, Inc. d/b/a IGS Energy, AMERIGreen Energy, and Rhoads Energy.

David J. Effron

OCA Statement No. 1 – Direct Testimony (April 12, 2016)

OCA Statement No. 1-SR – Surrebuttal Testimony (Proprietary and Public) (May 25, 2016)

David C. Parcell

OCA Statement No. 2 – Direct Testimony (April 12, 2016)

OCA Statement No. 2-SR – Surrebuttal Testimony (May 25, 2016)

Glenn A. Watkins

OCA Statement No. 3 – Direct Testimony (April 12, 2016)

OCA Statement No. 3R – Rebuttal Testimony (May 10, 2016)

OCA Statement No. 3-SR – Surrebuttal Testimony (May 25, 2016)

Roger D. Colton

OCA Statement No. 4 – Direct Testimony (April 12, 2016)

OCA Statement No. 4-SR – Surrebuttal Testimony (May 25, 2016)

James S. Garren

OCA Statement No. 5 – Direct Testimony (April 12, 2016)

OCA Statement No. 5-SR – Surrebuttal Testimony (May 25, 2016)

The parties to this proceeding agreed to stipulate to the admission of the OCA’s testimony into the record, and the testimony was admitted at the evidentiary hearing on June 2, 2016.

Pursuant to the Commission’s policy of encouraging settlements that are in the public interest, the OCA, I&E, OSBA, CAUSE-PA, UGIII, NGS Parties, RESA, CEO and UGI (Joint Petitioners) held numerous settlement conferences. These discussions resulted in this proposed Settlement. As discussed below, the OCA submits that the proposed Settlement is in the public interest.

II. TERMS AND SETTLEMENT

A. Revenue Requirement (Settlement ¶¶ 17-31)

1. Rate Increase

The proposed Settlement provides for an overall distribution base rate increase of \$27 million, about \$31.56 million less than the rate increase amount originally requested by UGI of

\$58.56 million. Settlement ¶ 17. The Settlement provides that the increase will not go into effect before October 19, 2016, the end of the suspension period. Settlement ¶ 17.

Based on the OCA's analysis of the Company's filings, testimony by all parties, and discovery responses received, the rate increase under the proposed Settlement represents a result that would be within the range of likely outcomes in the event of full litigation of the case. The OCA submits that the proposed increase, when accompanied by other important conditions contained in the Settlement, yields a result that is just and reasonable under the facts of this case.

2. Transportation Charges and Interruptible Class Revenues

The Settlement provides that the Company's proof of revenues, attached to the Settlement as Appendix B, will include increases to current revenues in the amounts of \$2.348 million for transportation charges and \$19.356 million for revenues from interruptible customers. Settlement ¶¶ 18-19. The Settlement also provides that the settlement rates will include \$18.996 million for interruptible revenues. Settlement ¶ 19. These provisions address two issues raised by OCA witnesses Glenn A. Watkins and David J. Effron: (1) the Company's filing did not reflect the Company's budgeted level of interruptible sales nor the ancillary transportation fee revenues within its current revenues, and (2) the Company's budgeted level of interruptible sale revenues was not reflected in the Fully Forecasted Future Test Year (FFFTY). See OCA St. 3 at 3-9; OCA St. 1 at 19-20. With these adjustments, the proof of revenues provided in Appendix B more accurately reflects the Company's current revenues. Further, because the Settlement rates reflect \$18.996 million for interruptible sales, the revenue increase agreed to under the settlement does not include recovery of revenues that the Company is reasonably certain to recover from the interruptible class in the FFFTY.

3. Environmental Remediation Costs

In its filing, the Company included a \$3.0 million expense related to environmental remediation costs. OCA witness Effron recommended the elimination of this expense because it represented an accrual for estimated costs that the Company may incur in the future but not an actual cost incurred by the Company, and as such was not properly recoverable from ratepayers. OCA St. 1 at 22-23. The Company had not entered into a final agreement with the Pennsylvania Department of Environmental Protection (PA DEP) as of the time that direct testimony was filed. The Company and PA DEP executed a finalized Consent Order and Agreement (COA) as of May 6, 2016, which has an effective date of October 1, 2016. See UGI St. 9-R at 4-5; UGI Exh. HGB-3. The COA relates to the environmental remediation of manufactured gas plants.

The Settlement provides for a \$2.0 million annual expense for environmental remediation costs. Settlement ¶ 20. This expense is reasonable because it represents an average amount of expense that the Company is likely to incur annually under the COA. Additionally, the Settlement provides that annual differences above or below \$2.0 million will be deferred as a regulatory asset or regulatory liability, respectively, and accumulated for book and ratemaking purposes until the Company's next base rate case. Id. This corrective mechanism prevents consumers from overpaying for the Company's environmental remediation costs.

4. Billing Determinants

In its filing, the Company used a twenty-one year regression analysis to demonstrate a declining trend in use per customer. OCA witness Effron opposed this approach and instead recommended that the Company use a five year trend, which shows that customer usage has in fact increased in recent years. OCA St. 1 at 15-19. Mr. Effron recommended that the Company's "Adjustment for Annualized Use/Customer" be removed, and that "the FPFTY

unadjusted use per customer should be used both for the purpose of determining the Company's revenue deficiency (or excess) under present rates and for the purpose of designing rates to produce the Company's approved revenue requirement." OCA St. 1 at 18-19.

In order to address these customer usage issues, the Settlement identifies the use per customer billing determinants for the Residential Heating and Commercial Heating classes, as well as total billing determinants for each customer class. Settlement ¶ 21. The Settlement billing determinants represent a compromise between the OCA and UGI positions on a significant and contentious issue in this case. The billing determinants result in realistic assumptions about trends in customer usage, and will result in rates that are just and reasonable.

5. DSIC

The Settlement provides that, as of the effective date of rates in this proceeding, UGI will be eligible to include plant additions in the DSIC once eligible account balances exceed the levels projected by UGI at September 30, 2017, the end of the fully forecasted future test year. Because the revenue requirement was settled, ratepayers benefit from using the year-end balance because the Company must realize a higher level of plant investment before any incremental expenditures can be recovered through a DSIC.

6. Return Check Fee

The Company's filing included a proposal to increase the returned check fee from \$20.00 to \$35.00. The Company provided that it was proposing this increase to its return check fee to make the amount of fee consistent with the fee amounts charged by its sister companies, UGI CPG and UGI PNG, which currently both charge \$35.00. See OCA St. 3 at 50. The OCA opposed the increase to the return check fee on the basis that the Company did not provide any

cost basis for increasing this fee. Id. Under the Settlement, the return check fee will remain \$20.00. Settlement ¶ 31.

B. Revenue Allocation (Settlement ¶¶ 32-36; Appendix B)

In its filing, UGI proposed to allocate approximately \$43 million of its proposed \$58.56 million revenue increase to residential customers. Under the revenue allocation agreed to by the Joint Petitioners, the residential class would receive approximately \$19 million of the \$27 million increase. Under the Settlement, the revenue increase allocated to the residential class is approximately \$24 million less than that proposed by the Company. If the Settlement is approved, the average total monthly bill for a residential customer using 57.3 ccf per month would be approximately \$56.11, as opposed to \$61.97, which would have been the average bill under UGI's proposal.

Based on the OCA's analysis of the Company's filing and discovery responses received, the revenue allocation under the proposed Settlement represents a result that would be within the range of likely outcomes in the event of full litigation of the case. Several parties, including the OCA, provided proposed revenue allocations, and the revenue allocation provided in Appendix B represents a compromise of a contentious issue. The revenue allocation yields a result that is just and reasonable under the circumstances of this case.

C. Residential Customer Charge (Settlement ¶ 33)

In its filing, UGI proposed to increase the residential customer charge from \$8.55 to \$17.50 per month, an increase of nearly 105%. The OCA opposed this level of increase and recommended that the customer charge be increased no higher than \$11.25 per month. See OCA St. 3 at 41-42. Although the OCA acknowledged that some level of increase to the customer charge was warranted, it was the OCA's position that the level of increase proposed by the

Company would cause rate shock to not only low volume customers that use small amounts of gas throughout the year but also virtually every residential customer during the non-heating months. See Id. Further, OCA witness Roger D. Colton testified that this scale of an increase to the customer charge would significantly impact low income customers. See OCA St. 4 at 24-36.

In line with the OCA's position, under the terms of the proposed Settlement, the residential customer charge will increase to \$11.75. Applying the rate increase to both the fixed monthly customer charge and to the volumetric charges is a reasonable compromise of this issue, as it allows customers – and low income customers, particularly – to still maintain a level of control over their monthly bill through usage reduction measures.

D. Energy Efficiency and Conservation Plan (Settlement ¶¶ 37-45)

The Settlement provides approval of UGI's proposed Energy Efficiency and Conservation Plan (EE&C Plan) with certain clarifications and modifications. See Settlement ¶¶ 37-45. In this proceeding OCA witness Glenn A. Watkins independently reviewed the proposed programs to be offered to residential customers through the EE&C Plan and determined that the programs are cost-effective under the Total Resource Cost test (TRC) and comparable to other conservation programs offered by NGDCs in other states. See OCA St. 3 at 45-46. Mr. Watkins, however, made recommendations regarding the budget of the proposed EE&C Plan and to specific residential programs. The Settlement incorporates several of Mr. Watkin's recommendations:

- The Settlement provides for a five-year total spending cap of \$27 million for the EE&C Plan. Settlement ¶ 37. This provision addresses Mr. Watkins' recommendation that a spending cap be placed on the EE&C Plan since its being funded by ratepayers. OCA St. 3 at 48. A spending cap is in the public interest because it promotes efficient spending on the part of the company and limits ratepayers' exposure for the implementation of the Plan.

- The Settlement provides that all appliances and equipment qualifying for rebates or incentives under the EE&C plan must meet or exceed U.S. Department of Energy “EnergyStar” Minimum Standards to the extent such standards exist. Settlement ¶ 43. This provision addresses Mr. Watkins’ concern regarding the Company’s proposal in the Residential Prescriptive Program to offer incentives for installing appliances and equipment with energy factors below the Energy Star minimum requirements. See OCA St. 3 at 46. This provision guarantees that this program only promotes and provides incentives for installing energy efficient appliances and equipment.
- The Settlement clarifies that incentives, rebates, or credits under the EE&C Plan are primarily intended to provide incentives to cover the cost difference between baseline gas and more efficient gas appliances. Settlement ¶ 44. This settlement provision addresses the OCA’s concern that the proposed EE&C Plan could be used as a ratepayer funded marketing tool to expand the Company’s business. See OCA St. 3 at 46. The OCA recommended that customers converting from other fuel sources should not be eligible for incentives under the EE&C Plan. See Id. Although the Settlement does not incorporate the OCA’s recommendation, the Settlement does provide assurance that the EE&C Plan is not intended to be, nor will be used, primarily as a marketing tool to expand its business. Further, the Settlement also provides that UGI will hold annual stakeholder meeting to review and discuss the EE&C Plan’s progress. Settlement ¶ 45. The stakeholder meetings provide stakeholders, including the OCA, the ability to monitor the customer type (new versus current) to which the Company is marketing the EE&C programs.

The Settlement also addresses the concern raised by OCA witness Roger D. Colton that the EE&C Plan does not adequately target multi-family housing buildings. See OCA St. 4 at 52-59. Mr. Colton testified that multi-family housing buildings have unique characteristics from other building types, and reliance on marketing techniques not specifically directed to multi-

family housing buildings could result in this housing segment not being adequately served. See Id. Under the Settlement, the Company agrees to “develop targeted EE&C Plan marketing materials for existing residential multi-family customers and new multi-family residential construction, ... with such materials focusing on targeting of property management companies and landlords.” Settlement ¶¶ 39. Further, the Company will coordinate with the Pennsylvania Housing Alliance and the Pennsylvania Housing Finance Agency and track participation for buildings with more than one unit. Settlement ¶¶ 39. These provisions seek to increase the participation of multi-family housing customers (i.e., owners and residents of multi-family buildings). Inclusion of multi-family housing buildings is in the public interest since multi-family housing buildings are substantially less energy efficient than other housing types. See OCA St. 4 at 54.

E. Universal Service (Settlement ¶¶ 35, 46-56)

1. Universal Service Rider

In his Direct Testimony, OCA witness Colton raised concerns regarding the need to adjust CAP credits to reflect the double-collection of bad debt expenses, adjust arrearage forgiveness credits for the double-collection of bad debt expenses, and apply a working capital offset to arrearage forgiveness credits when CAP participation levels exceed the level assumed for setting rates in the base rate case. OCA St. 4 at 4-24. The Settlement addresses these issues as follows:

Actual recoverable costs shall also reflect actual Customer Assistance Program (“CAP”) Credits and actual pre-program arrearages, provided that CAP participation on an average annual basis for the preceding year did not exceed 8,700 participants. In the event that CAP participation in the preceding year exceeded 8,700 on an average annual basis, actual recoverable costs shall reflect actual CAP Credits and actual pre-program arrearages for all customers up to the 8,700 participation level. For any and all CAP customers exceeding the 8,700

participation level on an average annual basis, UGI Gas shall offset the CAP Credits and actual pre-program arrearages by 9.4%.

Settlement ¶ 35. The OCA submits that this clause reasonably addresses the concerns raised by Mr. Colton in his Direct Testimony as to cost recovery under the Universal Service Rider, is consistent with the public interest and should be approved.

2. CAP Enrollment Improvements

OCA witness Roger Colton testified that UGI needs to do a better job of enrolling its confirmed low-income customers in the CAP Program, and also specifically targeting low-income customers who are in arrears for enrollment in the CAP Program. The Settlement provides a number of agreements to address these concerns. Specifically, UGI agrees to:

To enhance UGI Gas's CAP solicitation efforts, UGI Gas will encourage Community Based Organizations ("CBOs") to conduct additional outreach to these customers. UGI Gas agrees to include CAP outreach as an agenda item at its biannual Universal Service committee meetings, and will propose measures for enhanced CAP enrollment in its next triennial Universal Service filing.

UGI Gas agrees to continue to screen for eligibility and/or refer all individuals calling about a payment arrangement or similar credit-related issue to appropriate Universal Service programs.

Settlement ¶¶ 49, 51. The OCA submits that these enhanced initiatives to improve CAP enrollment are beneficial for the Company and its customers and the agreements here will provide the OCA and other stakeholders with the ability to advance these objectives in UGI's future Universal Service plans.

3. Enhanced Income Verification Procedures

Mr. Colton testified that the Company's current tariff and practices provide a very restrictive and limiting method for customers to verify their income level. As Mr. Colton observed, this is particularly concerning as it relates to the Commission's cold weather

termination protections for families with incomes below 250% of Federal Poverty. Mr. Colton provided a number of recommendations to enhance the current income verification methods.

The Settlement addresses these concerns, as follows:

UGI Gas agrees to modify proposed Tariff Rule 9.1(b) to state that “UGI Gas will use financial information from the customer provided within the most recent twelve (12) month period to determine if a customer exceeds the 250% federal poverty level threshold.” UGI Gas will not require customer information to verify income if the customer has established income verification through receipt of Low-Income Home Energy Assistance Program (“LIHEAP”) within the past 12 months or if the customer is currently participating in CAP.

UGI Gas will clarify its tariff language to reflect that it does not require annual income to establish eligibility for cold weather shutoff protections and that it does accept annualized income (i.e. 30-days, 90-days) to establish winter shutoff protections.

UGI Gas agrees to consult with its CBOs and investigate the feasibility of using alternative communication means (including but not limited to telephone, tax, email, and web-based alternatives) to process applications and verify income for the purposes of security deposit waiver and enrollment in Universal Service programs. Alternative methods determined to be feasible will be described in UGI Gas’s next triennial Universal Service filing, and implemented with the start of that USECP. If no alternatives are determined to be feasible, UGI Gas will include an explanation of its investigation and conclusions in its next Universal Service filing.

Settlement ¶¶ 48, 54 and 55. The OCA submits that the proposed modifications agreed to by UGI will greatly enhance and streamline the income verification process and provide a valuable benefit to customers consistent with the winter termination protections.

F. Other Provisions (Settlement ¶¶ 36 & 73)

1. Technology and Economic Development Rider

The Company proposed in its filing a new rider – the Technology and Economic Development Rider (TED Rider) – that, according to the company, was intended to promote the availability of gas to large commercial and industrial customers in unserved and underserved areas. Under the proposed TED Rider, UGI would have been able to offer negotiated rates with

DS and LFD customers and offer discounted rates to other new customers in which main extensions are required to serve these customers. See OCA St. 3 at 52-53. The OCA opposed the proposed TED Rider because as filed the rider gave the Company sole discretion in determining which main extension projects would be pursued and the rider could be used by UGI simply to attract new business. Id. The OCA recommended that that if UGI were to offer an economic development rate, the rate should be evaluated based on reasonable criteria with predefined constraints and requirements. Id. at 53.

The Settlement approves the TED Rider as a three-year pilot program. Settlement ¶ 36. The Settlement requires that the TED Rider will be modified to include language clarifying that the overall economics of the arrangement with the customer receiving the TED Rider must meet the economic tests applicable to line extensions. Id. Further, the Settlement requires that UGI will report on the economics of the TED Rider at least six (6) months before the end of the three-year pilot program and maintain records of all TED Rider investments and TED Rider negotiated rates. Id. Under the Settlement, UGI has also agreed that if it files a general base rate case during the three-year TED Rider pilot program, UGI Gas will provide information, as part of its initial filing, showing the pro forma rate of return on incremental investment for TED Rider customers as a sub-class in its filed cost of service study. Id. The conditions attached to the approval of the TED Rider pilot program under the Settlement provide reasonable assurance that the mains extensions and discounted rates provided through the TED Rider will not result in other customers subsidizing these extension projects. As such, approving the TED Rider, as modified by the Settlement, is in the public interest because it should promote the expansion of natural gas to commercial and industrial customers in unserved and underserved areas.

2. Proposed Rule 5.7: “Special Utility Service”

In its filing, UGI proposed to add a new Rule 5.7, entitled “Special Utility Service.” Under the proposed Rule 5.7, certain customers would be exempt from the rules for extensions. See OCA St. 3 at 51-52. In other words, the Company would be permitted to extend mains and other facilities to commercial and industrial customers without economic justification. The OCA’s witness Glenn A. Watkins opposed Rule 5.7, stating that “there must be predefined constraints to prevent abuses by the Company in simply extending its Mains that are not economically feasible and which must ultimately borne by all existing ratepayers.” Id. at 52. The Settlement provides that UGI will delete this rule from its tariff. Settlement ¶ 73. The OCA submits that removal of proposed Rule 5.7 is in the public interest, as it ensures that extensions of mains and facilities are economically justified.

III. CONCLUSION

For the foregoing reasons, the Office of Consumer Advocate submits that terms and conditions of the proposed Settlement are in the public interest and the interest of UGI's ratepayers and should be approved.

Respectfully submitted,

/s/ Amy E. Hirakis

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Date: June 30, 2016
222773

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate’s Statement in Support of the Joint Petition for Settlement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 30th day of June 2016.

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