

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Central Penn Gas, Inc. for Waiver : P-2016-2537609  
of the Distribution System Improvement Charge Cap :  
of 5% of Billed Distribution Revenues and Approval :  
to Increase the Maximum Allowable DSIC to 10% of :  
Billed Distribution Revenues :

**ORDER #6**  
**ADMISSION OF LATE-FILED EXHIBIT**

On September 9, 2015, an evidentiary hearing convened as scheduled for this proceeding. The following parties appeared at the proceeding:

- (1) UGI Penn Natural Gas (UGI-CPG)  
Danielle Jouenne, Esquire and Jessica Rogers, Esquire;
- (2) UGI-CPG Large Users Group (CPGLUG)  
Alessandra Hylander, Esquire;
- (3) Bureau of Investigation & Enforcement (I&E)  
Carrie Wright, Esquire;
- (4) Office of Consumer Advocate (OCA)  
Darryl Lawrence, Esquire and Harrison Breitman, Esquire; and
- (5) Office of Small Business Advocate (OSBA)  
Steven Gray, Esquire.

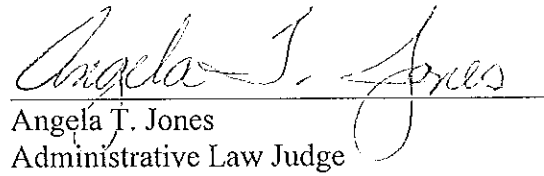
During the course of the proceeding, Mr. Gray introduce through the witness of OSBA an interrogatory identified as Central Penn Gas OSBA-I-5. The undersigned pointed out that the interrogatory was not in the record. Mr. Gray requested that it be filed as a late-filed exhibit. The Central Penn Gas OSBA-I-5 is attached to this Order. No party objected to the request to file the interrogatory as a late-filed exhibit. No party objected to the interrogatory's admission into the record. This order is to confirm that the interrogatory is admitted into the record and to ensure completeness of the record.

THEREFORE,

IT IS ORDERED:

1. That the interrogatory identified as OSBA-I-5 is admitted into the record without objection.
2. That the evidentiary record is closed for the purpose of receiving any further evidence.

Date: September 12, 2016

  
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Angela T. Jones  
Administrative Law Judge

ATTACHMENT

PENNSYLVANIA PUBLIC UTILITY COMMISSION :

v. :

Docket No. P-2016-2537609

Petition of UGI Central Penn Gas, Inc. for a :  
Waiver of the Distribution System Improvement Charge :  
Cap of 5% of Billed Distribution Revenues and Approval :  
to Increase the Maximum Allowable DSIC to 10% of :  
Billed Distribution Revenues :

Central Penn Gas(OSBA)-I-5:

Refer to OSBA Statement No. 1, page 4. Please identify situations in which an investor owned utility would not be able to file a base rate proceeding, but would be able to petition for an increase in the DSIC cap.

Response:

As the interrogatory refers to Mr. Knecht's testimony at page 4, which provides Mr. Knecht's non-legal interpretation of legal language for granting a waiver of the DSIC cap. Please see also Mr. Knecht's testimony at pages 5-7 which explains why there may be uncertainty regarding that interpretation.

It is Mr. Knecht's (non-legal) understanding that an investor-owned utility is always able to *petition* for a waiver of and/or an increase in the DSIC cap.

Assuming the interrogatory was meant to refer to the circumstances under which a waiver of the DSIC cap could be granted even when a rate case option was available to the utility, Mr. Knecht observes that, under extraordinary circumstances, a utility may not have access to capital markets necessary to raise funds needed to safely operate its distribution system, without being able to obtain near term rate relief that could not be achieved promptly through a lengthy base rates proceeding.

Witness: Robert D. Knecht

UGI-CPG Petition for waiver of 5% cap on DSIC and approval of maximum 10% for DSIC cap  
Docket No. P-2016-2537609

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