



COMMONWEALTH OF PENNSYLVANIA

November 3, 2016

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition of UGI Penn Natural 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
Docket No. P-2016-2537594**

Dear Secretary Chiavetta:

I am delivering for filing today the attached Letter in response to the Notification to the Parties of Official Notice Taken dated October 26, 2016, on behalf of the Office of Small Business Advocate (OSBA), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Honorable Angela T. Jones
Parties of Record
Mr. Robert D. Knecht



COMMONWEALTH OF PENNSYLVANIA

November 3, 2016

The Honorable Angela T. Jones
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

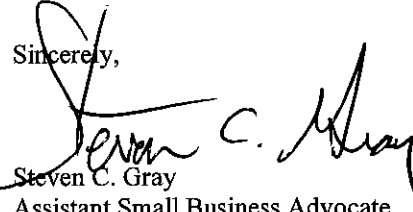
**Re: Petition of UGI Penn Natural Gas, Inc. for a Waiver of the Distribution System Improvement Charge Cap of 5% of Billed Distribution Revenues and Approval to Increase the Maximum Allowable DSIC to 10% of Billed Distribution Revenues
Docket No. P-2016-2537594**

Your Honor:

Pursuant to 52 Pa. Code § 5.408(c), the Office of Small Business Advocate (“OSBA”) submits this response to your October 26, 2016, *Notification to the Parties of Official Notice Taken* (“Notification.”).

In the *Notification*, you refer to a specific section of Appendix B in the *Petition of UGI Penn Natural Gas, Inc. for Approval of their Modified Long-Term Infrastructure Improvement Plan (LTIIP)*, at Docket No. P-2013-2397056 (“*Petition*”), which provides a redline comparison of investments under the Company’s original and revised LTIIPs, for both historical and forecast years. The OSBA is uncertain as to how the referenced information is relevant to the issues in this proceeding, and observes that no party introduced this evidence as relevant. Nevertheless, the OSBA does not object to including information from the *Petition* in the record for this proceeding. However, in order to ensure that this information is presented in its proper context, the OSBA respectfully requests that Your Honor notice the entire *Petition*, including appendices.

Furthermore, the Pennsylvania Public Utility Commission (“Commission”) entered an Order on June 30, 2016, approving the *Petition*. The OSBA respectfully requests that Your Honor also notice the June 30th Order.

Sincerely,

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Penn Natural Gas, Inc. :
for a Waiver of the Distribution System :
Improvement Charge Cap of 5% of :
Billed Distribution Revenues and : **Docket No. P-2016-2537594**
Approval to Increase the Maximum :
Allowable DSIC to 10% of Billed :
Distribution Revenues :

CERTIFICATE OF SERVICE

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

The Honorable Angela T. Jones
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
Angeljones@pa.gov

Jessica R. Rogers, Esquire
David B. MacGregor, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
jrogers@postschell.com
dmacgregor@postschell.com


Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17120
carwright@pa.gov
(Email and Hand Delivery)

Date: November 3, 2016

Danielle Jouenne, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
JouenneD@ugicorp.com

Erin L. Gannon, Esquire
Darryl A. Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street, Forum Place, 5th Floor
Harrisburg, PA 17101
egannon@paoca.org
dlawrence@paoca.org
(Email and Hand Delivery)

Alessandra L. Hylander, Esquire
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
ahylander@mcneeslaw.com
ppolacek@mcneeslaw.com
vkandrikas@mcneeslaw.com


Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538