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Jessica R. Rogers

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December 8, 2016

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. – Gas Division for Approval of a Distribution System Improvement Charge - Docket No. P-2013-2398833

Dear Secretary Chiavetta:

UGI Utilities, Inc. – Gas Division ("UGI-GD") herein respectfully requests a minor modification to the Opinion and Order issued by the Pennsylvania Public Utility Commission ("Commission") in the above captioned proceeding on November 9, 2016 ("Order"). Ordering Paragraph No. 6, on page 23 of the Order, states:

That UGI Utilities, Inc. – Gas Division shall provide the estimated number of anticipated new jobs to be created for specific replacement projects with its revised initial DSIC tariff. Additionally, UGI Utilities, Inc. – Gas Division shall track such employment information and provide the actual numbers of jobs created to the Commission by January 31st of each year.

UGI-GD respectfully requests that Ordering Paragraph No. 6 be revised to allow UGI-GD to include the job creation data in its Annual Asset Optimization Plan ("AAOP") each year, rather than on January 31st.

Pursuant to 52 Pa. Code § 121.6, UGI-GD is required to file its AAOP 60 days after the end of the Long Term Infrastructure Improvement Plan ("LTIIP") period. The UGI-GD LTIIP runs from January 1 to December 31 of each calendar year. Therefore, the AAOP must be filed by March 1 on an annual basis.

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UGI-GD requests that it be allowed to include the job creation data identified in Ordering Paragraph No. 6 as part of its AAOP, rather than as a stand-alone filing requirement. UGI-GD believes that making this information part of its AAOP filing will be more convenient for the Commission, the individuals reviewing the data, and the Company in meeting its annual filing obligations. In addition, the other data produced by the Company in its AAOP will provide important context for analyzing the job creation data. The small delay between January 31, the date currently specified in Ordering Paragraph No. 6, and the filing date of the AAOP should not impact the Commission's ability to review and use the information the Company will be providing. The Company respectfully requests that the Commission modify Ordering Paragraph No. 6 consistent with this letter request.

Copies of this letter request have been served in the manner indicated in the enclosed Certificate of Service. Please do not hesitate to contact me should you have any questions regarding this matter.

Respectfully submitted,

Jessica R. Røgers

JŔR/jl Enclosure

cc: Certificate of Service

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

Erin L. Gannon, Esquire Darryl Lawrence, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

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Date: December 8, 2016

Jessica R. Rogers