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January 23, 2017

VIA E-FILING

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

**Re: Petition of NRG Energy, Inc. for Implementation of Electric Generation
Supplier Consolidated Billing, Docket No. P-2016-2579249**

Dear Secretary Chiavetta:

Enclosed for filing, please find the Comments and Answer of UGI Utilities, Inc. – Electric Division to the above-caption petition being filing in accordance with the procedural schedule published in the December 24, 2016 edition of the *Pennsylvania Bulletin*.

Copies of this document have been served upon the persons indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Mark C. Morrow", is written over a horizontal line.

Mark C. Morrow

Counsel for UGI Utilities, Inc. – Electric Division

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of NRG Energy, Inc. for :
Implementation of Electric Generation :
Supplier Consolidated Billing : Docket No. P-2016-2579249

**COMMENTS AND ANSWER
OF
UGI UTILITIES, INC. – ELECTRIC DIVISION**

INTRODUCTION

UGI Utilities, Inc. – Electric Division (“UGI-ED”), in accordance with the provisions of 52 Pa. Code §5.61, and the Commission’s Secretarial letter published in the December 24, 2016 edition of the *Pennsylvania Bulletin*, submits the following comments and answer to the petition of NRG Energy, Inc. (“NRG”) filed on December 8, 2016. NRG’s petition requests various actions by the Commission to implement Electric Generation Supplier (“EGS”) consolidated billing “so that customers of electric generation suppliers may have the option of receiving a single bill from their EGSs that contain both their competitive supply charges and their tariffed delivery charges by the second quarter of 2018.” UGI-ED is a member of the Energy Association of Pennsylvania (“EAP”), fully supports the comments of EAP at this docket, including those which highlight the Commission’s lack of legislative authority to grant the relief requested by NRG, and submits its own comments to supplement those of EAP.

By way of background, UGI-ED is an electric distribution company (“EDC”) providing electric distribution service to approximately 62,000 customers in portions of two counties in northeastern Pennsylvania. Consistent with its statutory obligations, UGI-ED serves as the provider-of-last-resort (“POLR”) for its customers, and does so pursuant to a Commission-approved default service plan. As of the end of December, 2016 ten EGSs were providing

electric generation service to 1200 UGI-ED customers and of those 1200 customers, 338 were residential. NRG has never taken the steps necessary to become an authorized EGS on UGI-ED's system, and has never provided electric generation service to any of UGI-ED's customers.

UGI-ED takes necessary actions to provide safe and reliable electric service to its customers at just and reasonable rates, and has not sought to increase its base rates for over twenty years. To operate efficiently, UGI-ED seeks to share systems with its affiliated natural gas distribution companies – UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc. (collectively the “UGI Distribution Companies”). The UGI Distribution Companies are currently in the process of replacing their legacy customer information systems (“CIS”) with a new CIS that is expected to first become operational in the fall of 2017.

Over the past several years, UGI-ED has taken a number of actions to support electric retail choice in response to Commission initiatives. Those include:

- Implemented revisions to default service rate offerings in accordance with directives in the Commission's End State Default Service Order entered on February 15, 2013 at Docket No. I-2011-2237952 (“End State Order”).
- Implemented a new customer referral program with training of call center representatives in March of 2013.
- Developed and proposed a Standard Offer Service program as part of its default service filing at Docket No. P-2013-2357013.
- Implemented the Commission's Interim Guidelines Regarding Standards for Switching a Customer's Electric Generation Supplier pursuant to the Commission's Final Order entered on October 25, 2012 at Docket No. M-2011-2270442.

- Implemented revised Standards For Changing a Customer’s Electric Generation Supplier under 52 Pa. Code §§ 57.174 and 57.180, including the implementation of interim rules pending the anticipated activation of its new CIS, as approved by the Commission in an Order entered on May 7, 2015 at Docket No. P-2014-2449397.
- Implemented of a mechanism to permit remote access by EGSs to customer account numbers, as approved by a Commission Order entered on May 23, 2014 at Docket No. M-2013-2355751.
- Implemented of a Seamless Moves and Instant Connects Plan as of November 30, 2016 pursuant to a plan approved by the Commission in a Final Order entered on May 19, 2016 at Docket No. M-2014-2401126.
- Implemented enhanced access by EGSs to UGI-ED customer bills in June of 2015 in accordance with the Commission’s Final Order entered on May 23, 2014 at Docket No. M-2014-2401345.

In certain instances, because of the limitations of the UGI Distribution Companies’ legacy CIS, implementation of these actions has required the adoption of special interim procedures pending the planned implementation of the new CIS.

COMMENTS

The EAP’s comments filed at this docket highlight a number of legal and procedural barriers that would preclude implementation of SCB at this time, including a lack of legal authority to require SCB, and these comments need not be reiterated here. Moreover, even if the Commission had authority to implement SCB, as the Commission’s End State Order recognized, the Electronic Data Exchange Working Group (“EDEWG”) identified a number of issues that

would have to be resolved before Supplier Consolidated Billing (“SCB”) could be implemented.

These issues included:

- *What is the payment obligation of the EDC and EGS to each other?*
- *Which entity is responsible for providing regulatory inserts and information?*
- *Which entity addresses consumer billing disputes?*
- *Which entity is obligated to negotiate and track payment agreements?*
- *What are the eligibility standards for customers to participate in SCB?*
- *What occurs if an SCB customer fails to pay in full?*
- *What occurs if the EDC fails to submit billing information?*
- *What is the obligation of the EGS to handle hardship fund donations?*
- *Can utilities that provide and bill for both electric and gas segregate electric from gas charges if only the electric charges are SCB?*

Id. at p. 63. As the Commission also recognized in the End State Order:

We have substantial concerns that use of an SCB process may be even more unlikely now since POR programs are available. It is unclear how many suppliers would be willing to forgo the ease and convenience of utility consolidated billing under POR, where they have no bad debt risk, to opt for an SCB model where they assume the full burden of billing, collections and bad debt. We also point out that suppliers do currently have the option of issuing a separate bill to the customer (the dual billing option) if they find utility consolidated billing not conducive to their offerings or business model.

Id. at p. 67.

These questions and concerns about SCB recognized in the End State Order remain unresolved today, and regardless of how these issues might be ultimately resolved by either the General Assembly or the Commission, or both, implementation of SCB would require UGI-ED to expend considerable resources to develop the business process changes and CIS

modifications. Meanwhile, given that only NRG has filed a petition seeking implementation of its proposal for SCB, it appears SCB is of interest, at best, to only a single large marketer that has not elected to serve customers on UGI-ED's system. Importantly, depending on how the above-noted important public policy questions might be resolved, there is no assurance that even NRG would ultimately elect to pursue SCB, either on the EDC systems where it is currently active or those, such as UGI-ED's, on which it is not.

Accordingly, UGI-ED believes the Commission should deny NRG's petition on the basis that it does not have legal authority to require SCB at this time. Moreover, if and to the extent the General Assembly elects to grant the Commission authority to require SCB in the future, UGI-ED believe the Commission should only exercise such authority to require SCB on EDC systems where there is a demonstrated EGS interest in participating in the program, and where the Commission determines that the benefits of implementation outweigh the associated costs.

ANSWER

1. It is admitted that the Commission launched an investigation of the Commonwealth's retail electric market in an Order entered on April 29, 2011 at Docket No. I-2011-2237952 ("RMI Launch Order"), the content of which speaks for itself.

2. It is admitted that the Commission, after reviewing comments filed in response to the RMI Launch Order, entered an Order on July 28, 2011 at Docket No. I-2011-2237952 ("RMI Launch Order II"), the content of which speaks for itself.

3. No response to the averments of paragraph 3 is required because the content of the RMI Launch Order II speaks for itself.

4. It is admitted that the Commission entered the End State Order, the content of which speaks for itself.

5. It is admitted that the Commission entered the End State Order, the content of which speaks for itself.

6. It is admitted that the Commission entered the End State Order, the content of which speaks for itself.

7. It is admitted that the Commission entered the End State Order, the content of which speaks for itself.

8. It is admitted that the Commission entered the End State Order, the content of which speaks for itself.

9. It is admitted the Commission entered an Order on May 23, 2014 at Docket No. M-2014-2401345 (“Joint Bill Order”), the content of which speaks for itself. UGI-ED has no specific knowledge and therefore generally denies the implementation of the terms of the Joint Bill Order has not enabled EGSs to forge long-term relationships or engage in more effective communication with customers. UGI-ED has no specific knowledge and therefore generally denies the implementation of enhanced EGS access to UGI-ED bills has not had the desired effect of moving Pennsylvania toward a more robust and vibrant competitive market.

10. UGI-ED has no specific knowledge of when the concept of SCB was developed or adopted or not adopted in the electric restructuring proceedings of other EDCs, and therefore generally denies the averments of this paragraph.

11. UGI-ED admits that SCB issues were discussed by EDEWG, and that EDEWG identified policy issues that would need to be addressed as noted above in UGI-ED’s comments. While not having specific knowledge, UGI-ED believes it is likely that SCB was discussed by participants in Office of Competitive Market Oversight (“OCMO”) conference calls or meetings. UGI-ED has no specific knowledge of whether OCMO reported on a March 24, 2011 conference call that

“the Commission’s preference was for an interested party or parties to file a formal Petition to move forward with SCB[,]” but would note that the subsequently issued End State Order decided to take no immediate action to implement SCB.

12. It is admitted that EDCs, including UGI-ED, have implemented several changes designed to promote retail choice as noted in UGI-ED’s comments above. By way of further answer, some of these actions, such as UGI-ED’s recent implementation of seamless moves and instant connects procedures, have only occurring recently and have not been in place long enough to judge their ultimate impact on retail markets. The Commission’s published statistics concerning the level of retail choice speak for themselves. By way of further answer, the goal of the Electricity Generation Customer Choice and Competition Act (“Choice Act”) has never been to establish a specific percentage of shopping customers, but instead was focused on harnessing “competitive market forces” to control rates for electricity which were at the time of passage of the Choice Act “on average higher than the national average”, in large part because of concerns that “electricity is an important factor in decisions made by businesses concerning locating, expanding and retaining facilities in the Commonwealth.” 66 Pa.C.S. §2802 (4)-(6). Today, the vision of the Choice Act has been realized and all of the Commonwealth’s businesses and residents are experiencing the benefits of lower electricity costs determined through a well-functioning wholesale electric market, whether they are served by an EGS purchasing or generating power in such wholesale markets or through the default service offerings of EDCs which also procure power in such wholesale markets pursuant to default service plans approved and overseen by the Commission.

13. UGI-ED has no specific knowledge concerning the regulatory framework or operations of the Texas retail electric market, and therefore generally denies the averments of this paragraph.

14. UGI-ED admits that the changes initiated by the Commission through its retail market investigation have improved or are in the process of improving the overall retail electric market. UGI-ED denies the General Assembly intended to dictate specific levels of shopping or that current retail shopping levels indicate the intent of the General Assembly is being thwarted.

15-17. The averments of paragraphs 15-17 are essentially a prayer for relief to which no response is required. By way of further answer, however, UGI-ED denies that the relief NRG seeks is a “necessary step towards creating a vibrant competitive electric market for Pennsylvania’s retail customers.” UGI-ED also believes, for the reasons stated more fully in the comments filed by EAP at this docket, that the Commission lacks legal authority to require SCB implementation.

18. No response is required to this paragraph summarizing the organization of NRG’s petition.

19. UGI-ED has no specific knowledge of NRG’s organization or assets.

20. UGI-ED has no specific knowledge of the operations of NRG’s Texas based retail suppliers.

21. UGI-ED has no specific knowledge of the organization, operations or service offerings of NRG’s northeastern retail business.

22. It is admitted that NRG participated in the Commission’s retail market investigation. NRG’s comments submitted in this investigation speak for themselves. UGI-ED has no specific knowledge of the informal comments or positions NRG may have taken in the investigation. It is

denied that UGI-ED's billing system cannot accommodate the billing requirements of EGS's consistent with current Commission requirements.

23. UGI-ED has no specific knowledge of NRG's commitment to the Pennsylvania retail market. It is denied that NRG or other EGSs have been deprived of the right to bill for the services as customers have the right to elect to receive a separate bill from their EGS for the electric generation services their EGS provides. EGSs can also bill customers directly for other services they might provide. It is admitted that as a result of the statutory provisions of the Choice Act and the public policy decisions embodied therein, Pennsylvania consumers have the right to elect to receive default service from their EDC or other Commission-approved default service provider, and as a result not all customers will receive their electric generation service from an EGS. UGI-ED has no knowledge of whether more customers would elect to receive their electric generation service from an EGS if SCB were offered.

24. UGI-ED has no knowledge of NRG's business plans, or if its stated commitment to employ SCB would apply if the public policy questions, including those noted above, were not resolved to its satisfaction.

25. It is denied that the General Assembly's vision for retail electric markets has not been realized. By way of further answer, the General Assembly's continued support for the default service option was reaffirmed with the passage of Act 129 in 2008, and it did not take the opportunity to change those portions of the Choice Act addressing billing services at that time or thereafter. Moreover, if NRG believes the General Assembly is dissatisfied with current statutory provisions, its remedy is to seek appropriate legislative amendments to current law.

26. The averments in this paragraph are in the nature of a prayer for relief to which no reply is required.

27. Many of the averments in this paragraph are in the nature of a prayer for relief to which no reply is required. It is denied, however, that SCB is comparable to a retailer's purchase and transport of light bulbs for sale at a fixed retail price. EDCs are required by law to provide electric distribution service directly to customers, and have default service obligations, administer universal service programs, provide services pursuant to Commission-regulated rates and terms and conditions of service, and are subject to specific statutory requirements not applicable to the delivery of other goods and services, such as the sales of light bulbs.

28. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

29. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted. Moreover, UGI-ED believes it is unclear exactly how individual provisions of Chapter 56 would or could be administered by NRG, and extensive discussion and planning would be required to enable UGI-ED to change its business practices and systems to accommodate the public policy decisions that would have to be made by the General Assembly and/or the Commission.

30. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

31. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted. NRG also seems to be conceding that statutory changes would be required to extend the provision of Chapter 14 to EGSs.

32. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted. NRG also seems to be conceding that statutory changes would be required to extend the provision of Chapter 14 to EGSs.

33. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

34. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

35. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of

implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

36. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how the General Assembly or the Commission might implement SCB if necessary implementation authority was granted.

37. The averments of this paragraph are in the nature of a prayer for relief to which no reply is required. However, UGI-ED would note NRG is proposing a very specific means of implementing SCB that might not reflect how SCB would be authorized or implemented by the General Assembly or the Commission. By way of further answer, some of the specific proposals contained in this paragraph seem to contemplate either statutory or regulatory changes.

38. The provisions of the Public Utility Code speak for themselves. It is denied that because the Commission may approve an entity other than an EDC to be a default service provider, SCB has been authorized by the General Assembly or the Commission.

39. The terms of the Commission's End State Order speak for themselves, so no response to the averments of this paragraph is required.

40. It is denied the Commission's approval of SCB in the context of a Commission-approved voluntary settlement means that the Commission has the legal authority to impose SCB, as the Commission has the authority to approve voluntary settlement terms it might not otherwise have the authority to impose. *See Commonwealth of Pennsylvania v. IDT Energy*, Docket No. C-2014-2427657 (Tentative Opinion and Order entered June 30, 2016). As previously noted, the Commission lacks the legal authority to require SCB at this time for the reasons detailed in the EAP's comments at this docket.

41. It is denied that the Commission's past extension of Chapter 56 rules to EGS's providing billing services suggests that it was approving SCB since customers have a statutory right to elect to receive separate billing from EGSs for the electric generation service they receive from EGSs. It is also denied that Commission approval of voluntary settlements including some form of SCB means that the Commission has the legal authority to require SCB.

42. It is denied that approval of EDEWG standards applicable to EDC billing did or could provide the Commission with legal authority to require SCB or indicate a Commission intention to do so.

43. The content of the Commission's End State Order speaks for itself. It is denied that the Commission has ruled that it has the legal authority to require SCB of the sort proposed by NRG in its petition. The remaining averments of this paragraph are in the nature of a prayer for relief to which no reply is required.

44. It is denied that SCB was authorized by the General Assembly as part of its "vision" for retail energy markets. It is denied that Pennsylvania is not a national leader in promoting retail energy markets. UGI-ED has no specific knowledge if SCB would cause more consumers to shop, but it is denied that the Choice Act requires or intended to encourage specific shopping levels.

45. UGI has no specific knowledge of the cited JD Power findings, but believes, and therefore avers, that this is not a public document. By way of further answer, however, an internet search did find an associated JD Power press release which stated "*The three most frequently cited reasons customers avoid switching to a retail electric provider include the bill savings are not big enough to switch (44%); they are satisfied with the level of service they*

presently get from their local utility (37%); and they are concerned about getting worse service if they were to switch (26%)."

46. UGI-ED has no specific knowledge about how a customer might view the value of EGS service offerings. It is denied that EGS's are prevented under current rules from providing separate bills for their services to build a direct billing relationship with their customers or from offering other ancillary services and billing for them on combined basis. It is further denied that the General Assembly intended for the Commission to promote policies to try to dissuade consumers from placing an emphasis on the price of service offerings from EGSs if they chose to do so.

47. UGI-ED has no direct knowledge of the rules of the Texas retail electric market or of the results of any JD Power survey of customers participating in that market. By way of further answer, if NRG believes that if the regulatory structure of the Texas market is superior to that established by the General Assembly in Pennsylvania, its remedy is to seek appropriate legislative changes and not to petition the Commission for relief.

48. UGI-ED has no knowledge of whether the availability of SCB would cause more customers to select EGS service offerings. It is denied that availability of SCB in Pennsylvania is needed to permit "EGSs to use state of the art billing platforms". By way of further answer, only NRG has filed a petition seeking SCB, apparently to take advantage of billing systems it operates as a result of the public policy decisions made in Texas. This would presumably operate to the disadvantage of other EGSs not active in the Texas market if NRG's premise is correct that customer would place a significant value on SCB. Moreover, it is denied that NRG is prohibited from directly billing customers for its services in Pennsylvania.

49. It is denied that SCB would be required for the implementation prepaid service plans, to the extent the Commission might deem prepaid plans for distribution service to be in the public interest.

50. It is denied that SCB would be required in order to enable EDCs to offer flat bills to the extent flat billing, in lieu of current billing rules including budget billing, would be deemed to be in the public interest and consistent with statutory requirements.

51. It is denied that SCB is necessary to enable the provision of innovative services by EGSs, including services that might be made possible by smart meters. It is further denied that there has been a full “deployment of AMI and smart meters to all Pennsylvania customers.” The provisions of 66 Pa.C.S. §2807(f)(6) exempt EDCs, such as UGI-ED, serving 100,000 or fewer customers from the smart meter and time of use rate provisions of the Choice Act, and UGI-ED has in fact not deployed smart meters on its system.

52. It is denied that EGSs do not already have the ability to engage in frequent customer contacts, particularly in an age of instantaneous and ubiquitous electronic communication, or that customers would be better informed of their options if there was SCB. By way of further answer, customers already are informed of their shopping options under UGI-ED’s new customer referral program and through other means.

53. It is denied that EGSs do not already have the ability to frequently access their customers, or that customers are not already informed of their shopping options. By way of further answer, NRG’s averments raise questions as to whether they would seek to create an un-level playing field by marketing their services in lieu of informing customers of all of their options when handling billing inquires.

54. It is admitted that to the extent EGSs would elect to implement SCB, and pay EDCs for distribution charges without discount for bad debts, EDC customer uncollectible expense would decrease. Offsetting this, however, would be the associated credit risk in the event of EGS default, as well as the increased costs associated with changing business practices and systems to accommodate SCB rules. It is denied that customer rates would be lower under SCB, since EDCs would be required to maintain billing systems and business procedures as a “supplier of last resort” in the event EGSs would elect to discontinue or not implement SCB. Moreover, EGS would presumably have to recover the costs of uncollectible electric distribution charges through their electric generation charges.

55. It is denied that EGS’s cannot currently elect to bill for their electric generation services or bundle other value-added services onto their bills. UGI-Ed has no specific knowledge whether including charges for distribution service on such bills would significantly affect customer shopping levels or be in the public interest, but does believe that there would be a significant risk of negative customer perceptions of UGI-ED resulting customer disputes over EGS billing practices.

56. UGI-ED generally denies that EGSs are precluded from offering pre-paid service offerings within the limits of existing Commission regulations, or that SCB is the only means for NRG to make such service offerings.

57. It is admitted that flat bill plans may be offered by EGSs today. UGI-ED has no specific knowledge of whether more customers would elect flat bill plans if SCB was in place, but notes that its billing practices are fully in accord with existing statutory and regulatory requirements.

58. It is admitted that it is not practical to require frequent changes in EDC bills to accommodate EGS business plans. By way of further response EGS are free to bill for their own services if they wish to use their own billing systems to compete for customers.

59. It is denied that the Commission's initiative to provide more space on EDC bills for EGS messaging has been a failure or that EGS messaging is not included in the presentation of UGI-ED electronic bills.

60. It is admitted that enhanced EGS access to EDC bills does not currently permit individualized customer messaging on the EDC bill, but EGSs are free to bill for their own services and in an era of electronic communication do not require bills to send individualized messages to their customers.

61. UGI-ED has no specific knowledge of the referenced EDC bill format or the reasons therefore.

62. It is denied that EGSs need to include distribution charges on their bills to build relationships with their customers or promote retail choice, as is evidenced that the present petition has been filed by a single EGS that happens to have supportive billing system functionality because of restructuring decisions made in another state.

63. It is denied that there are no downsides to adopting SCB apart from EDI changes.

64. The provisions of EDEWG document attached as Appendix B to the petition speak for themselves, but the document indicates that on a considerable number of issues no consensus was reached.

65. The provisions of Appendix C to the petition speak for themselves.

75. The averments in this paragraph are in the nature of a prayer for relief and therefore do not require a response.

Respectfully submitted,



Mark C. Morrow (ID # 33590)
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Counsel for UGI Utilities, Inc. – Electric Division

Dated: January 23, 2017

VERIFICATION

Paul J. Szykman, deposes and says that he is Vice President – Rates and Government Relations and Vice President and General Manager, Electric Utilities; that he is duly authorized to and does make this Verification on behalf of UGI Utilities, Inc. – Electric Division; that the facts set forth in the foregoing Answer of UGI Utilities, Inc. – Electric Division. are true and correct to the best of his knowledge information and belief; and that this verification is made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).



Paul J. Szykman

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of NRG Energy, Inc. for :
Implementation of Electric Generation :
Supplier Consolidated Billing : Docket No. P-2016-2579249

CERTIFICATE OF SERVICE

I hereby certify that I have, this 23rd day of January, 2017, served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code §1.54 (relating to service by a participant):

VIA ELECTRONIC AND FIRST CLASS MAIL:

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Mark C. Morrow