



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

April 14, 2017

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> 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:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E)  
**Prehearing Memorandum** in the above-captioned proceeding.

Copies are being served on all active parties of record as evidenced in the attached  
Certificate of Service. If you have any questions, please contact me at (717) 783-6156.

Sincerely,

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

CBW/sea  
Enclosure

cc: ALJ Conrad Johnson  
Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Utilities, Inc.- Gas :  
Division for Approval of a Distribution : Docket No. P-2013-2398833  
System Improvement Charge :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated April 14, 2017, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

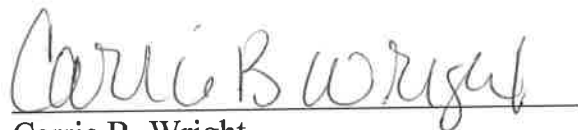
**Served via First Class and Electronic Mail**

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UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406



Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Utilities, Inc. – Gas Division :  
for Approval of a Distribution System : P-2013-2398833  
Improvement Charge :

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PREHEARING MEMORANDUM  
OF THE  
BUREAU OF INVESTIGATION AND ENFORCEMENT

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**TO ADMINISTRATIVE LAW JUDGE CONRAD JOHNSON:**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully submits the following Prehearing Memorandum in the above-captioned consolidated proceedings.

The Bureau of Investigation and Enforcement Prosecutor in these proceedings will be Carrie B. Wright. Contact information is as follows:

By mail: Carrie B. Wright  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

By e-mail: [carwright@pa.gov](mailto:carwright@pa.gov)  
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## **I. INTRODUCTION**

On March 31, 2016, UGI Utilities, Inc. (“UGI” or “Company”) filed a petition to establish and implement a Distribution System Improvement Charge (“DSIC”). By Order dated November 9, 2016 the Commission determined that UGI may elect to implement a DSIC mechanism. However, the Commission also assigned to the Office of Administrative Law Judge (“OALJ”) the issue of whether or not customers receiving service under specific Rate Schedules should be exempt from the DSIC.

A prehearing conference has been scheduled on April 18, 2017 at 10:00 a.m. with ALJ Conrad Johnson presiding.

## **II. ISSUES**

The issue is as follows:

- a. Whether or not customers receiving service under specific Rate Schedules should be exempt from the DSIC.

## **III. WITNESSES**

It is currently expected that I&E may call the following expert witness without being limited thereto:

Ethan Cline, Fixed Utility Valuation Engineer

The I&E witness may be contacted through the information listed above for Prosecutor Wright. The witness list is provided without the benefit of complete discovery or analysis of the positions of potential other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witness listed above.

#### **IV. EVIDENCE**

I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

#### **V. DISCOVERY**

No modifications to the rules of discovery are being proposed by I&E.

#### **VI. SCHEDULE**

I&E is working with the parties to develop a schedule in this proceeding.

#### **VII. SERVICE OF DOCUMENTS**

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E will accept electronic delivery of documents with a follow-up hard copy provided by regular first class mail.

#### **VIII. SETTLEMENT**

I&E is willing to make good faith efforts to successfully resolve this matter through settlement.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Carrie B. Wright". The signature is written in black ink and is positioned above the printed name.

Carrie B. Wright

Prosecutor

PA Attorney I.D. # 208185

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, Pennsylvania 17105-3265  
(717) 787-1976

Dated: April 14, 2017