



COMMONWEALTH OF PENNSYLVANIA

April 14, 2017

E-FILED

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

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

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, 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 attached Certificate of Service.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Steven C. Gray".

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

cc: The Honorable Conrad A. Johnson
Mr. Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). To discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence as follows:

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

II. FILING BACKGROUND

On March 31, 2016, UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) filed a Petition for Approval of a Distribution System Improvement Charge (“DSIC”) with the Commission. The OSBA filed a Notice of Intervention in this matter on April 20, 2016.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA's case in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA will participate in the case to assure that the interests of small business customers of UGI Gas are adequately represented and protected. Furthermore, the Commission has remanded this case to the Office of Administrative Law Judge to determine whether customers receiving service under specific Rate Schedules should be exempt from the DSIC.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

The OSBA states its willingness to enter settlement discussions.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA supports the procedural schedule that will be proposed by the Company.

Considering the Governor's requirement to reduce the operating budget of Commonwealth Offices, the OSBA respectfully requests that any evidentiary hearings take place in Harrisburg.

Respectfully submitted,



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

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Dated: April 14, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

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).

The Honorable Conrad A. Johnson
Administrative Law Judge
Pennsylvania Public Utility Commission
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Pittsburgh, PA 1522
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Date: April 14, 2017

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Attorney ID No. 77538