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April 10, 2018

via Electronic Filing

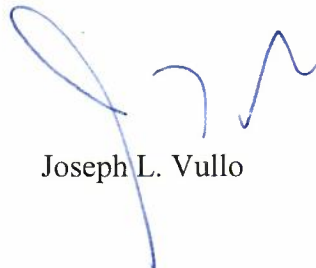
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Joint Application of UGI Utilities, Inc., UGI Penn Natural Gas, Inc. and
UGI Central Penn Gas, Inc., etc.
Docket Nos. A-2018-3000381
A-2018-3000382
A-2018-3000383

Dear Secretary Chiavetta:

Please accept for filing the Commission on Economic Opportunity's Petition to Intervene in the above-referenced matters. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | | |
|---|---|--------------|----------------|
| Joint Application of UGI Utilities, Inc., | : | Docket Nos.: | A-2018-3000381 |
| UGI Penn Natural Gas, Inc., and UGI | : | | A-2018-3000382 |
| Central Penn Gas, Inc. for All of the | : | | A-2018-3000383 |
| Necessary Authority, Approvals, and | : | | |
| Certificates of Public Convenience for | : | | |
| (1) an Agreement and Plan of Merger; | : | | |
| (2) the Merger of UGI Penn Natural | : | | |
| Gas, Inc. and UGI Central Penn Gas, Inc. | : | | |
| into UGI Utilities, Inc. of natural gas | : | | |
| service in all territory in this | : | | |
| Commonwealth where UGI Penn | : | | |
| Natural Gas, Inc. and UGI Central Penn | : | | |
| Gas do or may provide natural gas | : | | |
| services; (4) the abandonment by UGI | : | | |
| Penn Natural Gas, Inc. of all natural | : | | |
| gas service in this Commonwealth; | : | | |
| (5) the abandonment by UGI Central | : | | |
| Penn Gas, Inc. of all natural gas service | : | | |
| in this Commonwealth; (6) the adoption | : | | |
| by UGI Utilities, Inc. of UGI Penn | : | | |
| Natural Gas, Inc.'s and UGI Central | : | | |
| Penn Gas, Inc.'s Existing Tariffs and | : | | |
| their Application within New Service | : | | |
| and Rate Districts of UGI Utilities, Inc. | : | | |
| Corresponding to their Existing Service | : | | |
| Territories as UGI North and UGI Central, | : | | |
| respectively; (7) the adoption by UGI | : | | |
| Utilities of its Existing Tariff to be | : | | |
| applied to a new UGI South Service | : | | |
| and Rate District; (8) Where Necessary, | : | | |
| Associated Affiliated Interest | : | | |
| Agreements; and (9) any Other | : | | |
| Approvals Necessary to Complete the | : | | |
| Contemplated Transaction | : | | |

PETITION TO INTERVENE OF THE
COMMISSION ON ECONOMIC OPPORTUNITY

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.

2. CEO is an advocate for its clients - the low income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.

3. The name and address of CEO's attorney is:

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
Email: jlvullo@bvrrlaw.com

CEO respectfully requests that the name and address of its attorney be added to the Commission's official service list, and that all correspondence in this proceeding from the Commission be directed to the attention of Joseph L. Vullo, Esquire at the address listed above.

4. On March 8, 2018, UGI Utilities, PNG and CPG filed with the Commission a Joint Application requesting all necessary authority, approvals and certificates of public convenience from the Commission, pursuant to 66 Pa. C.S. §§1102(a)(1)-(3), 2102(a) and 2210, authorizing: (1) an Agreement and Plan of Merger; (2) the merger of PNG and CPG with and into UGI Utilities; (3) the initiation by UGI Utilities of natural gas service in all territories of the

Commonwealth where PNG and CPG do or may provide natural gas service: (4) the abandonment by PNG of all natural gas service in the Commonwealth; (5) the abandonment by CPG of all natural gas service in the Commonwealth; (6) adoption by UGI Utilities of PNG's and CPG's existing tariffs and their application within new service and rate districts of UGI Utilities corresponding to their existing service territories as UGI North and UGI Central, respectively; (7) the adoption by UGI Utilities of its existing tariff to be applied to a new UGI South service and rate district; and (8) to the extent necessary, associated affiliated interest agreements ("Joint Application").

5. Through the Joint Application, the Companies propose, through a one-step merger, to merge PNG and CPG with and into UGI Utilities, with UGI Utilities being the surviving entity. If approved the UGI Gas Division of UGI Utilities ("UGI Gas") will have three rate districts, including: (1) UGI South (formerly, UGI Gas); (2) UGI North (formerly, PNG); and (3) UGI Central (formerly, CPG). Under the proposal UGI Utilities will acquire all of the service rights and CPCs of PNG and CPG, as well as ownership interests of PNG's and CPG's property.

6. CEO is an advocate for its clients - the low income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures. The Commission's final disposition of these proceedings may adversely impact the rates, terms, and conditions under which CEO's clients receive service.

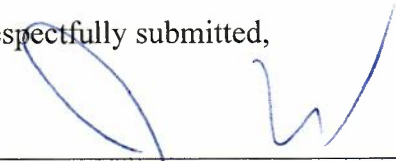
7. CEO has been granted intervener status in past proceedings involving these companies and in those past proceedings CEO has in large part addressed the effect of any proposal on residential customers, particularly low-income customers. Consistent with its past

involvement, if granted intervenor status, CEO will address whether the proposed transaction is in the public interest and how it would impact low-income customers.

8. Therefore, consistent with 52 Pa. Code §5.72(a), CEO has a significant interest in these proceedings that is not represented by any other part of record. Accordingly, CEO should be granted intervenor status in these proceedings.

WEREFORÉ, the Commission on Economic Opportunity respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the Commission on Economic Opportunity with full-party status in these proceedings.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
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Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com

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| into UGI Utilities, Inc. of natural gas | : | | |
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| Associated Affiliated Interest | : | | |
| Agreements; and (9) any Other | : | | |
| Approvals Necessary to Complete the | : | | |
| Contemplated Transaction | : | | |

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants this 10th day of April, 2018, via first-class mail and electronic mail:

David B MacGregor, Esq.
Garrett P. Lent, Esq.
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UGI Corporation
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King of Prussia, PA 19406

Richard Kanaskie, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

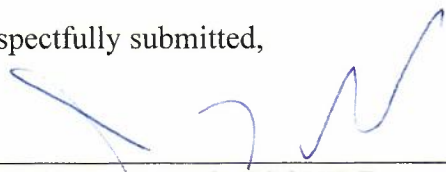
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Respectfully submitted,



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VERIFICATION

I, EUGENE M. BRADY, Executive Director of Commission on Economic Opportunity, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMISSION ON ECONOMIC
OPPORTUNITY

BY:



EUGENE M. BRADY, Executive Director

Dated: _____

4/10/2018