

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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September 23, 2019

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

Re: Petition of UGI Utilities, Inc. – Electric
Division for Approval of a Distribution
System Improvement Charge
Docket No. P-2017-2619834

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in blue ink that reads "Erin L. Gannon".

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Enclosures:

cc: Office of Administrative Law Judge
Certificate of Service

*279027

CERTIFICATE OF SERVICE

Re: Petition of UGI Utilities, Inc. – Electric :
Division for Approval of a Distribution : Docket No. P-2017-2619834
System Improvement Charge :

I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 23rd day of September 2019.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

David B. MacGregor, Esquire
Jessica R. Rogers, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

John Evans, Esquire
Office of Small Business Advocate
300 North Second Street
Commerce Building, Suite 202
Harrisburg, PA 17101-1303

Michael S. Swerling, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406



Erin L. Gannon
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Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: September 23, 2019
*279028

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Utilities, Inc. – Electric	:	
Division for Approval of a Distribution	:	Docket No. P-2017-2619834
System Improvement Charge	:	

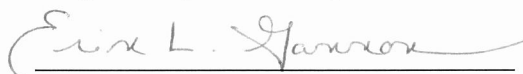
NOTICE OF INTERVENTION

Pursuant to 71 P.S. § 309-1, *et seq.*, and 52 Pa. Code § 5.71(a)(1), the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Office of Attorney General
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, Pa 17101-1923

Respectfully submitted,



Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487

Dated: September 23, 2019

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Answer and Intervention and participate in proceedings before the Commission involving the Petition by UGI Utilities, Inc. – Electric Division (UGI Electric or the Company) for approval of a Distribution System Improvement Charge (DSIC) at Docket No. P-2017-2619834.

On September 3, 2019, UGI Electric filed a Petition seeking approval of a DSIC and a proposed DSIC tariff, pursuant to 66 Pa. C.S. § 1353. The Company proposes an initial DSIC rate of 0.0%, and provides an illustrative example showing how it would calculate a non-zero DSIC rate.

The Acting Consumer Advocate has filed this Intervention with the Commission to ensure that UGI Electric's proposed DSIC rate and calculation is just and reasonable and complies Sections 1301, 1351, 1353, 1357 and 1358 of the Public Utility Code, 66 Pa. C.S. §§ 1351, 1353, 1357, 1358, consistent with sound public policy, and is not unduly discriminatory or otherwise unlawful. It is critical that the DSIC be calculated correctly, will recover only costs of DSIC-eligible property, and be applied equally to all customer classes. The OCA, therefore, will seek to ensure that only those costs which comply with the requirements of the Public Utility Code will be paid through a DSIC by the Company's ratepayers. Additionally, the OCA will also seek to ensure that any DSIC rate approved by the Commission is not unduly or otherwise excessive.