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File #: 178556

December 27, 2019

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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**Re: Petition of UGI Utilities, Inc. - Gas Division for Waiver of the 120-Day Filing Period
Under 52 Pa. Code § 53.52(b)(2)
Docket No. R-2019-**

Dear Secretary Chiavetta:

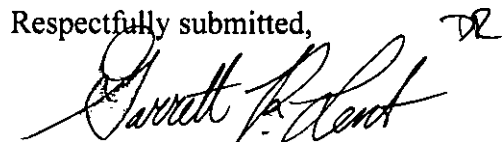
UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission for permission to depart from the requirements of 52 Pa. Code § 53.52(b)(2), concerning the time period between the end of an historic test year and the date on which a proposed increase in base rates is filed pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. § 1308(d). The Company is requesting a thirty-one (31) day extension to the filing date.

The Company intends to propose a general increase in base rates, which is designed to produce more than \$1 million in additional annual operating revenues. It intends to submit data in support of the proposed increased rates based upon an historic test year ended September 30, 2019, a future test year ending September 30, 2020, and a fully projected future test year ending September 30, 2021, as adjusted for ratemaking purposes. Under 52 Pa. Code § 53.53(b)(2), such filing is required to be submitted on, or before, January 28, 2020. The Company requests a thirty-one (31) day extension, in order that it may be permitted to submit this base rate filing on, or before, February 28, 2020. The Company may be able to file the base rate case on or before January 28, 2020, and would note that simultaneous to this petition it has filed the 30-day notice as required at 52 Pa. Code § 53.45, but it is filing this request for extension as a precautionary measure.

Rosemary Chiavetta, Secretary
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The foregoing petition for permission is limited to the filing requirement provisions of 52 Pa. Code § 53.52(b)(2), as they apply to the tariff or tariff supplement proposing an increase in base rates to be filed by the Company on or before February 28, 2020, and has no applicability to any subsequent tariff filing.

Respectfully submitted,



Garrett P. Lent

GPL/jl
Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA HAND DELIVERY

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Deana Schleig
Administrative Officer
PA Public Utility Commission
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Consumer Advocate
Office of Consumer Advocate
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Garrett P. Lent