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March 5, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division;
Docket No. R-2019-3015162**

Dear Secretary Chiavetta:


Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Conference Memorandum of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 
Derrick Price Williamson
Barry A. Naum

DPW/sds

Enclosures

c: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail and First-Class Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2019-3015162
	:	
UGI Utilities, Inc. – Gas Division	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL AND FIRST-CLASS MAIL

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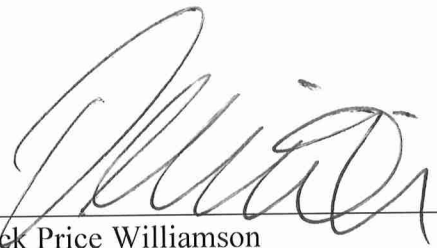
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Derrick Price Williamson

Dated: March 5, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2019-3015162
	:	
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**PREHEARING CONFERENCE MEMORANDUM OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

Pursuant to the Prehearing Conference Order issued on February 27, 2020, by Deputy Chief Administrative Law Judge ("ALJ") Christopher P. Pell, the Industrial Energy Consumers of Pennsylvania ("IECPA"), hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On January 28, 2020, UGI Utilities, Inc. – Gas Division ("UGI" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Company's Supplement No. 6 to UGI Tariff – PA P.U.C. Nos. 7 and 7s ("Filing"), representing a request for a general increase in the Company's annual base rate revenues of \$74.6 million to be effective March 28, 2018. The effective date of new rates was suspended until October 28, 2020, by Order of the Commission issued on February 27, 2020, wherein the Commission assigned this matter to the Office of Administrative Law Judge and also ordered an investigation into the lawfulness, justness, and reasonableness of UGI's existing rates, rules, and regulations. On that date, ALJ Christopher P. Pell issued a Prehearing Order establishing a Prehearing Conference to be held on

March 9, 2020. On March 5, 2020, IECPA filed a Petition to Intervene to participate in this proceeding. A description of IECPA is set forth in its Petition to Intervene.

II. REPRESENTATION AND SERVICE CONTACT

IECPA is represented by counsel with contact information as follows:

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As requested by the February 27, 2020, Prehearing Order, Mr. Naum will act as lead attorney for the purpose of the Prehearing Conference.

III. ANTICIPATED ISSUES

IECPA is still evaluating the Company's Filing and anticipates being informed by the record created in this case. At this preliminary stage, however, IECPA plans to pay careful attention to the proposed overall revenue increase, the allocation of costs among the various rate classes, particularly to industrial transportation rate classes, and UGI's requested overall Return on Equity of 10.95%. IECPA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESSES AND EVIDENCE

IECPA is still in the process of evaluating whether it will sponsor testimony in this proceeding. Regardless, IECPA reserves the right to participate in this proceeding and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

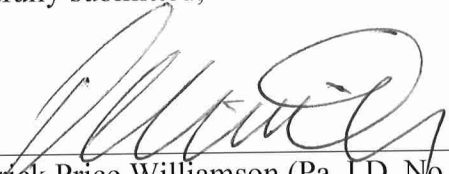
V. PROPOSED SCHEDULE AND DISCOVERY RULES

IECPA will cooperate with the ALJ and the parties to formulate a reasonable procedural schedule and discovery rules in accordance with the Commission's regulations and ALJ directives.

VI. SETTLEMENT

IECPA is willing to participate in settlement discussions so as to narrow or resolve issues in dispute among the parties.

Respectfully submitted,

By 
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Counsel to Industrial Energy Consumers of Pennsylvania

Dated: March 5, 2020