



DEPARTMENT OF THE ARMY
TOBYHANNA ARMY DEPOT
11 HAP ARNOLD BOULEVARD
TOBYHANNA PA 18466-5054

REPLY TO
ATTENTION OF:

March 5, 2020

Via Electronic Filing

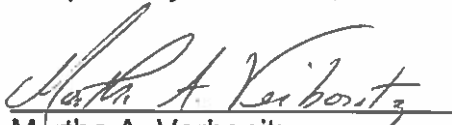
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

Re: PA PUC v. UGI Utilities, Inc., Docket No. R-2019-3015162

Dear Secretary Chiavetta,

Enclosed for electronic filing please find: (1) Petition to Intervene by the United States Department of Defense and all other Federal Executive Agencies; and (2) Motion for Admission pro hac vice. Copies of the petition and the motion will be served electronically in accordance with the attached Certificate of Service.

Respectfully submitted,


Martha A. Verbonitz

Counsel for United States Department of Defense
and all other Federal Executive Agencies

cc: Deputy Chief Administrative Law Judge Christopher P. Pell (Cpell@pa.gov)
Certificate of Service List

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
	:	
v.	:	Docket Nos. R-2019-3015162
	:	C-2020-3018289
UGI Utilities, Inc.	:	C-2020-3018858
	:	C-2020-3017207

**PETITION TO INTERVENE BY UNITED STATES DEPARTMENT OF DEFENSE
AND ALL OTHER FEDERAL EXECUTIVE AGENCIES**

In accordance with 52 Pa. Code §§ 5.72-5.75, the United States Department of Defense and all other Federal Executive Agencies (“DOD/FEA”) files this Petition to Intervene in Docket No. R-2019-3015162 and related Docket Nos. C-2020-3015163; C-2020-30151632, and C-2020-30151634 as a full intervening party. In support of this Petition, DOD/FEA states as follows:

1. DOD/FEA consists of certain agencies of the United States Government which have offices, facilities, or installations in the service area of UGI Utilities, Inc. (“UGI”). UGI’s rate case would (if approved in full) substantially increase the annual costs to DOD/FEA for natural gas services in Pennsylvania. The General Services Administration has delegated to the Department of Defense and to the U.S. Army authority to intervene in this proceeding to represent and to protect the consumer interests of DOD/FEA.

2. DOD/FEA’s installations in UGI’s service territory include Tobyhanna Army Depot, Carlisle Barracks/Army War College, Letterkenny Army Depot, Defense Logistics Agency Susquehanna (Eastern Distribution Center), and other federal facilities. These military installations employ thousands of full time personnel and are substantial consumers of natural

gas. Because of DOD/FEA's unique load and reliability requirements, DOD/FEA's interests in this rate case cannot be adequately represented by any other party. DOD/FEA's interests will be substantially and specifically affected by the proceeding and DOD/FEA's participation in this matter is not only appropriate but is necessary to protect its interests. DOD/FEA will act in a timely manner to meet any deadlines established by the Commission or the ALJ and DOD/FEA's participation in this proceeding will not broaden any issue or delay the proceeding in any way.

3. DOD/FEA meets the standards for intervention in this proceeding set forth in 52 Pa. Code § 5.72(a). As a direct customer of UGI and consumer of UGI's services, DOD/FEA possesses interests which may be directly affected and which are not adequately represented by existing participants, and as to which petitioner may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(1). UGI is proposing to modify the rates and terms of service for various customer classes, including classes in which DOD/FEA is a member. DOD/FEA has unique interests because of the size of the load at its installations and because of DOD/FEA's interest in ensuring reliability of gas service in support of ongoing military operations and related activities. Intervention is also permitted where participation of the person or entity may be in the public interest. As one of the largest employers in UGI's service territory, DOD/FEA's participation in this proceeding is in the public interest.

4. DOD/FEA is also seeking to intervene in this proceeding to ensure that all of UGI's existing rates, rules, and regulations are just, reasonable and non-discriminatory related to DOD/FEA's interest as a major consumer of natural gas on UGI's system.

5. Counsel filing this petition is a duly authorized representative of DOD/FEA.

DOD/FEA's counsel's name, title, agency, address, e-mail, and telephone number are:

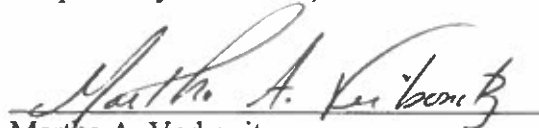
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6. Counsel for DOD/FEA consents to the service of documents in this proceeding by electronic mail to Martha.a.verbonitz.civ@mail.mil (with copies to john.j.mcnutt.civ@mail.mil) as authorized by 52 Pa. Code § 1.54(b)(3).

WHEREFORE, DOD/FEA respectfully requests that the Pennsylvania Department of Public Utilities grant this Petition to Intervene (and accompanying Motion for Admission *pro hac vice*) and provide DOD/FEA with full party status in this proceeding.

Dated: March 5, 2020

Respectfully Submitted,



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Verification

I, John J. McNutt, am a United States Army attorney and authorized to verify this petition on behalf of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA). I hereby state that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief and that I expect DOD/FEA to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to sworn falsification to authorities).

Dated: March 4, 2020

A handwritten signature in black ink, appearing to read 'John J. McNutt', with a horizontal line extending to the right from the end of the signature.

John J. McNutt

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via Electronic Mail

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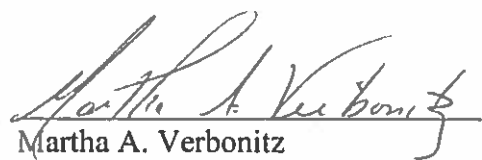
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Dated this 5th day of March, 2020


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