



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 18, 2020

**Via Electronic Mail**

Hon. Christopher P. Pell  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Room 4063  
Philadelphia, PA 19107

Re: Pennsylvania Public Utility Commission v.  
UGI Utilities, Inc. – Gas Division  
Docket No. R-2019-3015162  
**I&E Rebuttal Testimony**

Your Honor:

Enclosed please find a copy of the following prepared **Rebuttal Testimony** of the Bureau of Investigation and Enforcement's (I&E) witness:

Christopher Keller      I&E Statement No 2-R

Copies are being served on active parties of record as evidenced in the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* If you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Scott B. Granger".

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

SBG/ac  
Enclosure

cc: Secretary Rosemary Chiavetta (*Cover Letter & Certificate of Service, via e-file only*)  
Per 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 am serving the foregoing **Rebuttal Testimony** on June 18, 2020, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Hon. Christopher P. Pell  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Room 4063  
Philadelphia, PA 19107  
[cpell@pa.gov](mailto:cpell@pa.gov)  
[धारवेल्ल@pa.gov](mailto:धारवेल्ल@pa.gov)  
[pmcneal@pa.gov](mailto:pmcneal@pa.gov)

Kent Murphy, Esq.  
Michael S. Swerling, Esq.  
Danielle Jouenne, Esq.  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
[murphyke@ugicorp.com](mailto:murphyke@ugicorp.com)  
[स्वरलिंगM@ugicorp.com](mailto:स्वरलिंगM@ugicorp.com)  
[jouenned@ugicorp.com](mailto:jouenned@ugicorp.com)

Steven C. Gray, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)

Darryl Lawrence, Esq.  
Phillip D. Demanchick, Esq.  
Barrett C. Sheridan, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
[DLawrence@paoca.org](mailto:DLawrence@paoca.org)  
[PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)  
[BSheridan@paoca.org](mailto:BSheridan@paoca.org)

Michael W. Hassell, Esq  
Garrett P. Lent, Esq.  
Devin Ryan, Esq.  
Jessica Rogers, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[dryan@postschell.com](mailto:dryan@postschell.com)  
[jrogers@postschell.com](mailto:jrogers@postschell.com) (*email only*)  
*Counsel for UGI Utilities, Inc.*

David B. MacGregor, Esq.  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
*Counsel for UGI Utilities, Inc.*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CEO*

John W. Sweet, Esq.  
Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Jerome D. Mierzwa  
Lafayette Morgan  
Exeter Associates, Inc.  
10480 Little Patuxent Pkwy  
Suite 300  
Columbia, MD 21044-3575  
[OCAUGIGAS2020@paoca.org](mailto:OCAUGIGAS2020@paoca.org)  
*Consultants for OCA*

Robert D. Knecht  
Industrial Economics, Inc.  
2067 Massachusetts Ave  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)  
*Witness for OSBA*

Daniel Clearfield, Esq.  
Carl R. Shultz, Esq.  
Kristine E. Marsilio, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)  
*Counsel for Direct Energy*

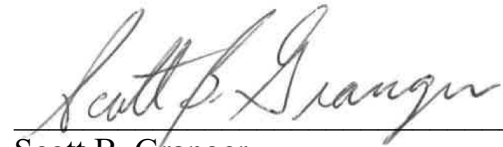
David Torakeo  
517 Grandview Avenue  
Camp Hill, PA 17011  
[davidtorakeo@hotmail.com](mailto:davidtorakeo@hotmail.com)

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)

Derrick Price Williamson, Esq.  
Barry A. Naum, Esq.  
Spilman Thomas & Battle PLLC  
1100 Bent Creek Blvd, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
*Counsel for  
Industrial Energy Consumers of PA*

Martha A. Verbonitz, Esq.  
United States Army  
Tobyhanna Army Depot  
11 Hap Arnold Blvd  
Tobyhanna, PA 18466-5000  
[martha.a.verbonitz.civ@mail.mil](mailto:martha.a.verbonitz.civ@mail.mil)  
*Counsel for DOD/FEA*

John J. McNutt, Esq.  
US Army Legal Services Agency  
Regulatory Law Division  
9275 Gunston Rd (ELD-4315)  
Fort Belvoir, VA 22060  
[john.j.mcNutt.civ@mail.mil](mailto:john.j.mcNutt.civ@mail.mil)  
*Counsel for DOD/FEA*

A handwritten signature in cursive script, reading "Scott B. Granger", written over a horizontal line.

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641