

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Consumer Advocate

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October 13, 2011

Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17101

Re: Kathleen Moran-Roberto, Docket No. C-2011-2251178
John Calafut, Docket No. C-2011-2253878
Jerome Fuhr, Docket No. C-2011-2254311
John Hennigan, Docket No. C-2011-2262771
Dolores Alar, Docket No. C-2011-2266076
Daniel Pope, Docket No. C-2011-2258722
v.
UGI Penn Natural Gas, Inc.

Dear Chief Judge Rainey:

Enclosed please find two copies of the Office of Consumer Advocate's Motion to Consolidate in the above-referenced proceeding. The original is being filed today with the Secretary's Office.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Dianne E. Dusman" followed by a stylized flourish.

Dianne E. Dusman
Senior Assistant Consumer Advocate
PA Attorney I.D. #38308

Enclosures

cc: Secretary's Office of the PUC
Honorable Ember S. Jandebour
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

KATHLEEN MORAN-ROBERTO	:	
v.	:	Docket No. C-2011-2251178
UGI PENN NATURAL GAS, INC.	:	
	:	
JOHN CALAFUT	:	
v.	:	Docket No. C-2011-2253878
UGI PENN NATRUAL GAS, INC.	:	
	:	
JEROME FUHR	:	
v.	:	Docket No. C-2011-2254311
UGI PENN NATURAL GAS, INC.	:	
	:	
JOHN HENNIGAN	:	
v.	:	Docket No. C-2011-2262771
UGI PENN NATURAL GAS, INC.	:	
	:	
DOLORES ALAR	:	
v.	:	Docket No. C-2011-2266076
UGI PENN NATURAL GAS, INC.	:	
	:	
DANIEL POPE	:	
v.	:	Docket No. C-2011-2258722
UGI PENN NATURAL GAS, INC.	:	

MOTION TO CONSOLIDATE

Pursuant to 52 Pa. Code Sections 5.81 and 5.103, the Office of Consumer Advocate (OCA) hereby moves for the consolidation of the above-captioned matters. The OCA understands that all of these Complaints address similar facts and legal issues concerning PNG's failure to extend natural gas mains to Gas Beyond the Mains (GBM) customers. The OCA submits that the Commission should consolidate these Formal Complaints for purpose of administrative efficiency.

In support of this Motion to Consolidate Proceedings, the OCA submits the following:

Basis for Consolidation

1. On May 24, 2011, PNG sent out notices to all GBM customers explaining proposed changes to PNG's propane service in its 1307(f) proceeding, docketed at R-2011-2238943. The letter informed GBM customers that PNG had proposed phasing GBM customers on to market based propane prices.

2. On June 24, 2011, Kathleen Moran-Roberto filed a formal complaint claiming that Pennsylvania Gas and Water Co. (PGW), now PNG, had promised to extend gas mains to her home in the 1970's. Ms. Moran-Roberto is now requesting that PNG extend the mains as promised or continue to provide propane at the existing natural gas rates.

3. On July 16, 2011, Jerome Fuhr filed a formal complaint requesting that in the mid-1960's, PGW promised to extend mains up to his building. Mr. Fuhr's complaint seeks to have PNG continue to charge GBM rates until the mains are extended as promised.

4. On July 17, 2011, John Calafut filed a formal complaint stating that he originally had an agreement with PGW that if he installed a gas furnace PNG would "run a natural gas line up [his] road." Mr. Calafut's complaint requests that PNG either "install natural gas line up our road... or continue to sell propane gas at natural gas prices."

5. On September 6, 2011, John Hennigan filed a formal complaint protesting PNG's proposed rate increase for GBM customers and requesting that PNG continue to charge GBM rates until PNG extends its mains as promised.

6. On September 28, 2011, Dolores Alar filed a formal complaint stating that in 1967 she installed a gas heat system in her home with the understanding that she would receive

propane gas at natural gas prices until PNG's predecessor, PGW, installed natural gas lines to her home. Ms. Alar's complaint requests that PNG continue to provide propane gas at natural gas prices until PNG runs a gas line to her property.

7. On August 19, 2011, Daniel Pope filed a formal complaint alleging that in 1966 PGW promised to provide propane at natural gas prices until PGW extended natural gas mains to Mr. Pope's home. Mr. Pope now requests that PNG continue to provide propane at natural gas prices until PNG extends natural gas service to his home.

8. The OCA understands that all of the above-captioned complainants request for PNG to extend natural gas mains to their properties as Pennsylvania Gas and Water Co. promised in the 1960's and 1970's.

9. Consolidation here is appropriate because all of the Formal Complaints address similar issues concerning PNG's failure to provide main extensions to the above-captioned complainants.

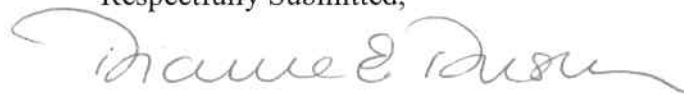
10. The OCA believes that consolidation is appropriate here because consolidation would promote administrative efficiency in the resolution of these Formal Complaints.

11. In addition, consolidation of these Formal Complaints will provide for uniformity of action and organization for the Formal Complainants, the Commission, PNG, the OCA, and other interested parties as all attempt to resolve these matters in an orderly and timely fashion.

12. In a conversation with the undersigned on October 12, 2011, counsel for PNG advised that the Company has no objection to consolidation of these six cases.

WHEREFORE, OCA respectfully requests that the Commission consolidate the above-captioned Formal Complaints for the reasons discussed above.

Respectfully Submitted,



Dianne Dusman
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DATED : October 13, 2011

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

KATHLEEN MORAN-ROBERTO	:	
v.	:	Docket No. C-2011-2251178
UGI PENN NATURAL GAS, INC.	:	
JOHN CALAFUT	:	
v.	:	Docket No. C-2011-2253878
UGI PENN NATRUAL GAS, INC.	:	
JEROME FUHR	:	
v.	:	Docket No. C-2011-2254311
UGI PENN NATURAL GAS, INC.	:	
JOHN HENNIGAN	:	
v.	:	Docket No. C-2011-2262771
UGI PENN NATURAL GAS, INC.	:	
DOLORES ALAR	:	
v.	:	Docket No. C-2011-2266076
UGI PENN NATURAL GAS, INC.	:	
DANIEL POPE	:	
v.	:	Docket No. C-2011-2258722
UGI PENN NATURAL GAS, INC.	:	

PROPOSED ORDER

AND NOW this _____ day of October 2011, upon consideration of the OCA's Motion to Consolidate the above-captioned cases, said Motion is hereby GRANTED.

It is hereby ORDERED that the above-captioned cases are consolidated for hearing, briefing, and adjudicating.

Date: _____

BY THE COURT:

CERTIFICATE OF SERVICE

KATHLEEN MORAN-ROBERTO	:	DOCKET NOS. C-2011-2251178
JOHN CALAFUT	:	C-2011-2253878
JEROME FUHR	:	C-2011-2254311
JOHN HENNIGAN	:	C-2011-2262771
DOLORES ALAR	:	C-2011-2266076
DANIEL POPE	:	C-2011-2258722
v.	:	
	:	
UGI PENN NATURAL GAS, INC.	:	

I hereby certify that I have this day served a true copy of the foregoing Motion to Consolidate upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 13th day of October 2011.

SERVICE IN PERSON

Johnnie E. Simms, Esquire
Bureau of Investigation & Enforcement
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17101

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Christopher T. Wright, Esquire
Post & Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Jerome Fuhr
111 Windswept Road
Tunkannock, PA 18657

Kathleen Moran-Roberto
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Moosic, PA 18507-1135

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