



March 12, 2012

**VIA ELECTRONIC FILING**

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

**Re: Petition of PECO Energy Company for Approval of Its Default Service Program; Docket No. P-2012-2283641**

Dear Secretary Chiavetta:

Enclosed please find the original plus three (3) copies of the Prehearing Memorandum of UGI Energy Services, Inc., in the above-captioned proceeding. As evidenced by the attached Certificate of Service, the parties of record have been served in the manner indicated.

Should you have any questions concerning this filing, please feel free to contact me at (610)-992-3750.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Melanie Elatieh". The signature is fluid and cursive, written over a light background.

Melanie J. Elatieh  
Counsel for UGI Energy Services, Inc.

Enclosure

Cc: Service List

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY        :**  
**FOR APPROVAL OF ITS DEFAULT                :**        **Docket No. P-2012-2283641**  
**SERVICE PROGRAM                               :**

**PREHEARING MEMORANDUM OF  
UGI ENERGY SERVICES, INC.**

Before the Pennsylvania Public Utility Commission (the "Commission"), pursuant to 52 Pa. Code §§5.222, UGI Energy Services, Inc. d/b/a UGI EnergyLink ("UGIES"), by its undersigned counsel, hereby respectfully submits this Prehearing Memorandum.

**I.     BACKGROUND**

On January 13, 2012, PECO Energy Company ("PECO" or "the Company") filed the Petition of PECO Energy Company for Approval of Its Default Service Program ("Petition") with the Commission. The Petition seeks approval of PECO's proposed second Default Service Program ("DSP II") to secure default service supply for the Company's customers for the period from June 1, 2013 through May 31, 2015. On February 7, 2012, UGIES filed a petition to intervene in this proceeding in order to protect UGIES' interests as an electric generation supplier in the PECO service territory.

**II.    IDENTIFICATION OF ISSUES**

At this time, UGIES is still formulating its position on the issues presented by the DSP II Petition. As appropriate and necessary, UGIES will investigate and analyze the claims and proposals of the Company and other parties that arise in this proceeding. Without limiting the generality of the foregoing, UGIES is still developing its position with respect to the Company's

proposed retail market enhancements – specifically, the Opt-In EGS Offer Program and the Customer Referral Program – which UGIES believes may potentially impact the current retail marketplace and potentially affect the ability of UGIES, and suppliers like it, to compete in the Commonwealth’s retail electricity market. UGIES reserves the right to pursue additional issues as they may arise throughout the course of the proceeding.

**III. WITNESS**

To the extent it deems necessary, UGIES reserves the right to present testimony in this proceeding. UGIES expects to present expert testimony by:

Matthew S. Dutzman  
Vice President - Power Development  
UGI Energy Services, Inc.  
One Meridian Boulevard, Suite 2C01  
Wyomissing, PA 19610  
Phone: (610) 373-7999  
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UGIES reserves the right to substitute witnesses with requisite personal knowledge and technical expertise and to call such additional witnesses as may be required to respond to issues raised by other parties.

**IV. EVIDENCE**

To the extent it deems necessary to present testimony, UGIES intends to present testimony of the witness above as well as any exhibits and other evidence that may be relevant.

**V. SERVICE OF DOCUMENTS**

UGIES requests that the Commission and all parties of record serve copies of all non-confidential discovery requests and answers, correspondence, Commission Orders and any other documents issued on both UGIES (Jodi S. Larison) and its attorney. UGIES’ counsel agrees to accept electronic delivery of documents on the due date as satisfying the in-hand requirement,

followed by hard copy delivery to UGIES' attorney by first class mail. Service by electronic mail only is acceptable to be made to Jodi S. Larison:

Jodi S. Larison  
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**VI. SETTLEMENT**

UGIES is willing to enter into settlement discussions.

**VII. PROCEDURAL SCHEDULE**

UGIES has no objection to the procedural schedule proposed by the Company. UGIES will cooperate with the presiding officer and the other parties to develop a mutually acceptable schedule for this case.

Respectfully submitted,



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Counsel for UGI Energy Services, Inc.

Dated: March 12, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for  
Approval of Its Default Service Program**

:  
: **Docket No. P-2012-2283641**  
:  
:  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 12th day of March, 2012, served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

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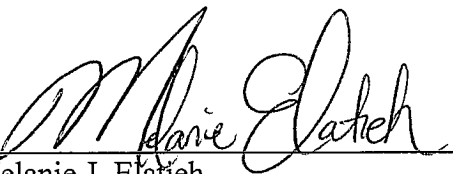
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Dated: March 12, 2012