



June 4, 2012

VIA ELECTRONIC FILING

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

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015; Docket No. P-2012-2302074;

Petition to Intervene of UGI Energy Services, Inc. d/b/a UGI EnergyLink

Dear Secretary Chiavetta:

Enclosed for electronic filing in the above-captioned proceeding, is the Petition to Intervene of UGI Energy Services, Inc. d/b/a UGI EnergyLink. Copies of the Petition to Intervene have been served in accordance with the attached Certificate of Service.

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

Respectfully yours,

A handwritten signature in black ink, appearing to read "Melanie Elatieh". The signature is fluid and cursive.

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

Enclosure

Cc: Service List

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015	: : : : : :	Docket No. P-2012-2302074
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**PETITION TO INTERVENE OF
UGI ENERGY SERVICES, INC.**

Pursuant to 52 Pa. Code §§ 5.71-5.76, UGI Energy Services, Inc. d/b/a UGI EnergyLink (“UGIES”), by its undersigned counsel, hereby petitions to intervene in the above-captioned proceeding. In support of its intervention, UGIES states as follows:

1. UGIES’ principal place of business is:

One Meridian Boulevard, Suite 2C01
Wyomissing, PA 19610

Jodi S. Larison
Senior Manager, Business Development
UGI Energy Services, Inc.
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2. The name and address of UGIES’ counsel in this matter is:

Melanie J. Elatieh (ID #209323)
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3. UGIES' attorney is authorized to receive service on behalf of UGIES in this proceeding. 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 and its attorney. Particularly, UGIES respectfully requests that service (both electronic and paper) be made to its counsel of record, Melanie J. Elatieh, while electronic service be made to Jodi S. Larison.

4. On May 1, 2012, PPL Electric Utilities Corporation ("PPL Electric") filed a Petition seeking approval of its Default Service Program ("DSP Petition") pursuant to Section 2807(e) of the Public Utility Code to cover its default service provider obligations in its certificated service territory for the period June 1, 2013 through May 31, 2015.

5. Under Section 5.72(a), a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought may file a petition to intervene. The right or interest must be at least one of the following:

- (1) A right conferred by a statute of the Commonwealth;
- (2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding; or
- (3) Another interest of a nature such that the participation of the petitioner may be in the public interest.

52 Pa. Code § 5.72(a)(1)-(3).

6. UGIES is an indirect, wholly-owned subsidiary of UGI Corporation, a holding company with several subsidiaries that distribute, store, transport and market energy products and related services. Among such subsidiaries of UGI Corporation include three natural gas distribution companies and one small electric distribution company ("EDC") regulated by the

Pennsylvania Public Utility Commission – namely, UGI Utilities, Inc. – Gas Division, UGI Central Penn Gas, Inc., UGI Penn Natural Gas, Inc. and UGI Utilities, Inc. – Electric Division.

7. UGIES is licensed to provide electricity supply to retail customers behind nineteen (19) electric utility companies in Pennsylvania, New Jersey, Delaware, Maryland, the District of Columbia and New York.

8. UGIES is a Commission-approved electric generation supplier (“EGS”), licensed at Docket No. A-110076 since July 24, 1998, to provide retail electricity supply and related services to all customer classes in all EDC service territories within the Commonwealth of Pennsylvania.

9. As a Commission-approved EGS, UGIES currently provides electric generation supply service to small, medium and large commercial and industrial customers across the Commonwealth, including the PPL Electric service territory.

10. In the DSP Petition, PPL Electric proposes, among other things, a variety of programs intended as retail market enhancements in accordance with the Commission’s recommended directives to EDCs as set forth in the Commission’s *Final Order re: Investigation of Pennsylvania’s Retail Electricity Market Recommendations Regarding Upcoming Default Service Plans*, Docket No. I-2011-2237953, entered December 16, 2011. Such programs are designed to change the current retail marketplace, which may affect the ability of UGIES to compete in the Commonwealth’s retail electricity market. Thus, as an existing retail supplier in PPL Electric’s service territory, UGIES clearly possesses a direct and substantial interest which may be affected by the Commission’s resolution of the proceeding. No other party can adequately represent UGIES’ interests in this matter.

11. Furthermore, UGIES will be bound by the action of the Commission in this proceeding. UGIES must compete against the default service rate and against other EGSs; how the default rate and retail market enhancement programs are structured could have a substantial impact on UGIES ability to continue to compete in PPL Electric's service territory. Thus, the public interest requires that UGIES be afforded the opportunity to be heard in this proceeding.

12. Due to the early stage of this proceeding, UGIES is still formulating its position on the DSP Petition and will finalize its position after it has had an opportunity to further study and evaluate the filings, conduct discovery and obtain additional information as necessary.

WHEREFORE, for all the above-mentioned reasons, UGI Energy Services, Inc. d/b/a/ UGI EnergyLink respectfully requests that its Petition to Intervene be granted and that it be allowed full party status in this proceeding.

Respectfully submitted,



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Counsel for UGI Energy Services, Inc.

Dated: June 4, 2012

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for Approval of a Default	:	Docket No. P-2012-2302074
Service Program and Procurement Plan	:	
for the Period June 1, 2013 through May	:	
31, 2015	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, this 4th day of June, 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):

VIA FEDERAL EXPRESS AND E-MAIL:

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Dated: June 4, 2012