



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;**

***Prehearing Memorandum of UGI Energy Services, Inc. d/b/a UGI EnergyLink***

Dear Secretary Chiavetta:

Enclosed for electronic filing in the above-captioned proceeding, please find the Prehearing Memorandum of UGI Energy Services, Inc. d/b/a UGI EnergyLink. Copies of the Prehearing Memorandum 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,

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

Enclosure

Cc: Service List

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>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</b>	:	<b>Docket No. P-2012-2302074</b>
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**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 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. On June 4, 2012, UGIES filed a petition to intervene in this proceeding in order to protect UGIES' interests as an electric generation supplier in the PPL Electric service territory.

**II. IDENTIFICATION OF ISSUES / WITNESSES / EVIDENCE**

At this time, UGIES is still formulating its position on the issues presented by the DSP 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 new/moving customer referral program, the Standard Offer Customer Referral Program and the Retail Opt-In Auction – which UGIES believes may potentially impact the current retail marketplace and potentially affect the ability of UGIES to compete in the Commonwealth’s retail electricity market. UGIES reserves the right to pursue issues as they may arise throughout the course of the proceeding.

To the extent it deems necessary, UGIES reserves the right to present testimony in this proceeding. At this time, UGIES has not identified any witnesses, the designation of which will depend on the complete list of issues and sub-issues UGIES identifies. UGIES reserves the right to identify (and substitute) any witness(es) with requisite personal knowledge and technical expertise as may be required as this proceeding develops and issues are identified.

In addition to testimony, to the extent it deems necessary, UGIES intends to present any exhibits and other evidence that may be relevant.

### **III. 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  
Senior Manager, Business Development  
UGI Energy Services, Inc.  
One Meridian Boulevard, Suite 2C01  
Wyomissing, PA 19610  
Phone: (845) 353-7512  
Fax: (610) 374-4288  
E-mail: [jlarrison@ugies.com](mailto:jlarrison@ugies.com)

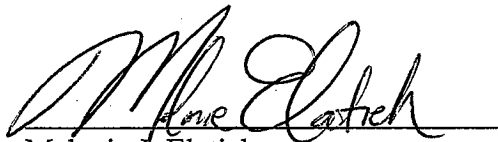
IV. **SETTLEMENT**

UGIES is willing to enter into settlement discussions.

V. **PROCEDURAL SCHEDULE**

UGIES has no objection to the dates set forth in the Administrative Law Judge's First Prehearing Order in this proceeding for the hearings, briefs, Recommended Decision, exceptions and reply exceptions. UGIES will cooperate with the presiding officer and the other parties to develop a mutually acceptable schedule for this case, including testimony and any necessary modifications to the dates set forth in the First Prehearing Order.

Respectfully submitted,



Melanie J. Elatich  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
Tel.: (610) 992-3750  
Fax.: (610) 992-3258  
E-mail: ElatichM@ugicorp.com

*Counsel for UGI Energy Services, Inc.*

Dated: June 4, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities** : **Docket No. P-2012-2302074**  
**Corporation for Approval of a Default** :  
**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:**

The Honorable Susan D. Colwell  
Office of Administrative Law Judge  
Commonwealth Keystone Building  
400 North Street  
PO Box 3265  
Harrisburg, PA 17105-3265  
[scolwell@pa.gov](mailto:scolwell@pa.gov)

**VIA FIRST CLASS MAIL AND E-MAIL:**

Michael W. Hassell, Esquire  
Post & Schell PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mhassell@postschell.com](mailto:mhassell@postschell.com)

David MacGregor, Esquire  
Post & Schell PC  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Paul Russell, Esquire  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
[perussell@pplweb.com](mailto:perussell@pplweb.com)

Tanya J. McCloskey  
James A. Mullins, Esquire  
Erin L. Gannon, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[TMcCloskey@paoca.org](mailto:TMcCloskey@paoca.org)  
[JMullins@paoca.org](mailto:JMullins@paoca.org)  
[EGannon@paoca.org](mailto:EGannon@paoca.org)

Regina L. Matz, Esquire  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Bo 3265  
Harrisburg, PA 17105-3265  
[matz@pa.gov](mailto:matz@pa.gov)

Todd S. Stewart  
Hawke McKeon & Sniscak LLP  
P.O. Box 1778  
100 N. Tenth Street  
Harrisburg, PA 17105-1778  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Gary Jeffries, Esquire  
Assistant General Counsel  
Dominion Resources Services, Inc.  
501 Martindale Street  
Suite 400  
Pittsburg, PA 15212-5817  
[Gary.A.Jeffries@dom.com](mailto:Gary.A.Jeffries@dom.com)

Vince Parisi, Esquire  
General Counsel  
Interstate Gas Supply Inc. d/b/a IGS  
Energy  
6100 Emerald Pkwy.  
Dublin, OH 43016  
[vparisi@igsenergy.com](mailto:vparisi@igsenergy.com)

Steven C. Gray, Esquire  
Elizabeth Rose Triscari, Esquire  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[etriscari@pa.gov](mailto:etriscari@pa.gov)

Daniel Clearfield, Esquire  
Eckert Seamans  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

Charles E. Thomas III, Esq.  
Norman J. Kennard, Esq.  
Thomas, Long, Niesen & Kennard  
212 Locust Street, Suite 500  
P.O. Box 9500  
Harrisburg, PA 17108-9500  
[Cet3@thomaslonglaw.com](mailto:Cet3@thomaslonglaw.com)

Becky Merola  
Government Affairs – East  
Noble Americas Energy Solutions LLC  
5325 Sheffield Ave  
Powell, Ohio 43065  
[bmerola@noblesolutions.com](mailto:bmerola@noblesolutions.com)



Melanie J. Elatich

*Counsel for UGI Energy Services, Inc.*

Dated: June 4, 2012