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December 17, 2012

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<u>Via Fed Ex Overnight (Priority)</u> Pennsylvania Public Utility Commission **ATTN: Secretary, Rosemary Chiavetta** Commonwealth Keystone Building 400 North Street 2nd Floor Harrisburg, Pennsylvania 17105 DEC 17 2012

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Re: Request for Oral Argument by Manuel E. Cruz, Intervenor <u>PA PUC v. UGI Utilities, Inc.</u> C-2012-2308997 Allentown Gas Explosion (02/09/11)

Dear Ms. Chiavetta:

Please be advised that this Firm represents Intervener, Manuel Cruz, in the abovecaptioned matter. Enclosed please find an original and one (1) copy of Intervener, Manuel Cruz's Request for Oral Argument in the above-captioned matter. Kindly file the original and return a time-stamped copy to our attention in the enclosed, self-addressed, stamped envelope provided for your convenience.

Thank you for your immediate attention to this matter.

Very truly yours Christian M errucci

CMP/rmd Enclosures cc: as per Certificate of Service.

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSIBLE CEIVED

Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement

UGI Utilities, Inc.

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

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REQUEST FOR ORAL ARGUMENT BY MANUEL E. CRUZ, AS ADMINISTRATOR OF THE ESTATES OF KATHERINE CRUZ AND OFELIA A. BEN, AND MANUEL E. CRUZ,

AND NOW COMES Manuel E. Cruz, Intervenor, by and through his attorneys, Florio Perrucci Steinhardt & Fader, L.L.C., by Christian M. Perrucci, Esquire, and hereby respectfully files the instant Request for Oral Argument and in support thereof avers as follows:

1. Manuel E. Cruz is an adult individual who was granted intervenor status in this matter by way of Judge Salapa's October 22, 2012 "Initial Decision Approving the Joint Settlement Petition."

2. On or about November 20, 2012, Manuel Cruz filed "Exceptions" to Judge Salapa's "Initial Decision Approving the Joint Settlement Petition" strenuously objecting to the proposed fourteen (14) year cast iron replacement plan set forth in the proposed settlement.

3. Thereafter, on or about December 7, 2012, Manuel Cruz filed a Petition for Remand requesting that the matter be remanded to Judge Salapa to afford Manuel Cruz the opportunity to be heard by the Administrative Law Judge prior to the approval of the joint settlement proposal.

4. Both the "Exceptions" to the Initial Decision Approving the Joint Settlement and the Petition for Remand filed by Manuel Cruz remain pending before the Public Utilities

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Commission.

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5. By way of the instant Request for Oral Argument, Intervener, Manuel Cruz, seeks to be heard with respect to both the "Exceptions" to the Initial Decision Approving the Joint Settlement and the Petition for Remand and would request that oral argument be held in furtherance of the same.

WHEREFORE, Manuel E. Cruz, Intervenor, respectfully requests that oral argument be scheduled with respect to the "Exceptions" to the Initial Decision Approving the Joint Settlement and the Petition for Remand.

Respectfully submitted,

FLORIO, PERRUCCI, STEINHARDT & FADER, LLC

By

Dated: December 17, 2012

Christian M. Perrucci, Esq. Attorney ID No. 90408

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Petition for Remand upon persons listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party):

Notification by First Class Mail and/or Electronic Mail:

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

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David B. MacGregor, Esquire Christopher T. Wright, Esquire Post & Schell, PC Four Penn Center 1600 John F. Kennedy Blvd Philadelphia, PA 19103-2808 Email: dmacgregor@postschell.com Email: cwright@postschell.com Adam D. Young, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265 Email: adyoung@pa.gov

Kent D. Murphy UGI Corporation 460 North Gulph Road King of Prussia, PA 19406 Email: murphyke@ugicorp.com

FLORIO, PERRUCCI, STEINHARDT & FADER, LLC

By

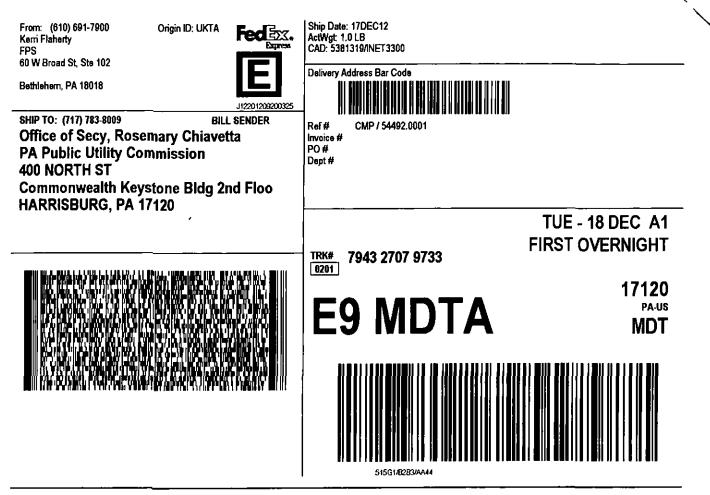
Christian M. Ferrucci, Esq. Attorney ID No. 90408

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Dated: December 17, 2012



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