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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

June 18, 2014

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. UGI Utilities, Inc. Docket No. C-2012-2308997

Dear Secretary Chiavetta:

I write to strenuously object to the Order of the Pennsylvania Utility Commission (PUC) accepting the Leak Detection Pilot Program ("Pilot Program") submitted by UGI Utilities, Inc. (UGI) under the PUC's Order entered on February 19, 2013 (the "Order").

The Pilot Program which the PUC accepted as compliant with its Order continues to put the safety of the residents of the City of Allentown (the "City") at risk.

The PUC ordered UGI to "explore enhanced leak detection measures and file a pilot program *to utilize one or more of those enhanced leak detection measures throughout the City of Allentown...*"

The Order contemplated that UGI would explore enhanced detection measures before filing a Pilot Program and identify, include and use enhanced measures in its Pilot Program, not use the Pilot Program to study alternative detection measures.

In its Pilot Program, filed on April 12, 2013, UGI will use a three-fold approach:

1. Initiate a Request for Proposal (RFP) to solicit alternative gas leak detection measures to be implemented in the City during the 2013-2014 winter season;
2. As an interim measure, undertake additional quarterly leak detection surveys of all cast iron mains in the City from April 1, 2013 through November 30, 2013 using traditional measures; and
3. Provide a written report to the PUC on or before June 14, 2014 describing the results of the Pilot Program.



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UGI states that , through the RFP process, it “will be able to identify and test alternative natural gas leak detection measures in the City of Allentown during the 2013/2014 winter period. *This will allow the Company to evaluate these alternative measures to determine whether they are practical means to enhance or improve the existing natural gas leak detection surveys and patrols currently performed...*”

As the comments the PUC Bureau of Investigation & Enforcement (I&E) filed on May 21, 2013 in response to the Pilot Program state, it was contemplated that UGI would implement enhanced leak detection measures immediately by way of the Pilot Program, not at the end of an RFP process next year in 2014.

UGI will use the results of its Pilot Program to evaluate whether there are any alternatives. This implies that UGI may not use enhanced leak detection measures if it does not find any alternatives that are “practical”, with the word “practical” meaning cost effective, which is more in the interest of UGI than the residents of the City.

Although I acknowledge that my comments come after you have already approved the UGI Pilot Program, I wanted to express my vigorous objection.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ed Pawlowski', with a stylized flourish at the end.

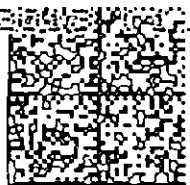
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