



Danielle Jouenne, Esq.

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April 16, 2015

**VIA ELECTRONIC FILING**

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

**Re: UGI Central Penn Gas, Inc. Annual Asset Optimization Plan ("AAOP") Data  
Request, Dated April 1, 2015  
Docket No. M-2015-2469648**


Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned matter, please find the verified responses of UGI Central Penn Gas, Inc. ("CPG") to the First Data Request of the Bureau of Technical Utility Services ("TUS"), dated April 1, 2015.

The original verification of Hans Bell, Vice President of Engineering and Operations Support will be delivered under separate cover via overnight mail for filing pursuant to 52 Pa. Code § 1.36(a).

Copies of this document have been served as indicated on the enclosed Certificate of Service.

Very truly yours,

  
Danielle Jouenne  
Counsel for UGI Central Penn Gas, Inc.

Enclosure

Cc: Matthew Stewart, TUS (mattstewar@pa.gov)  
Certificate of Service

Docket No. M-2015-2469648  
UGI - Central Penn Gas  
Annual Asset Optimization Plan Filed 2-27-15  
Data Request 1

1. On page 5 of CPG's AAOP, CPG describes the reasons for the planned cost increases for infrastructure improvement in 2015 relative to CPG's long Term Infrastructure Improvement Plan (LTIIIP). Specifically, CPG mentions that a combination of ahead of paving work and reliability issues that arose during this winter's extreme cold are the cause of this increase for 2015. Pursuant to this explanation, please use the format provided below to provide a breakdown of the costs and amounts of infrastructure associated with the categories of work listed:

*Response:*

**Table 1**

	Miles of Main (miles)	Cost (\$ Million)
Planned LTIIIP projects <sup>1</sup>	15.0	13.5
Ahead of Paving Projects	4.1	5.0
Winter Reliability Projects	1.2	1.9

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<sup>1</sup> Page 5 of UGI-CPG Annual Asset Optimization Plan as filed February 27, 2015

**VERIFICATION**

I, Hans Bell, Vice President of Engineering and Operations Support, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

*Hans J. Bell*

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Hans Bell

Date: April 16, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2014- 2015 Annual Asset Optimization Plan  
of UGI Central Penn Gas, Inc.

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Docket No: M-2015-2469648

CERTIFICATE OF SERVICE


I hereby certify that I have, this 16th day of April, 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 FIRST CLASS MAIL:**

Erin L. Gannon  
Brandon J. Pierce  
Office of Consumer Advocate  
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Danielle Jouenne