

CAPTION SHEET

CASE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: ALJ
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR: SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: C-20065930
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 02/24/06
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: STATE YMCA OF PENNSYLVANIA, INC.

RESPONDENT/APPLICANT: UGI UTILITIES, INC.

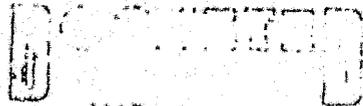
COMP/APP COUNTY: DAUPHIN

UTILITY CODE: 123100

ALLEGATION OR SUBJECT

COMPLAINANT STATES THAT THE GAS BILL FOR 10/11/05-11/09/05 INDICATED AN INCREASE IN USAGE OF 141% OVER THE SAME PERIOD THE PREVIOUS YEAR DESPITE AN INCREASE IN THE AVERAGE DAILY TEMPERATURE FROM 50 TO 53 DEGREES. THEY ARE SEEKING AN ADJUSTMENT OF THE BILL FOR THE PERIOD IN QUESTION TO BRING IT INTO LINE WITH THE HISTORICAL USAGE RATES FOR THE SAME PERIOD. THEY ARE SEEKING THAT THE COMPANY PUT SYSTEMS IN PLACE TO FLAG FOR REVIEW ALL PAST AND FUTURE CUSTOMER STATEMENTS THAT SHOW UNUSUAL PATTERNS OF REPORTED USAGE AS COMPARED TO HISTORICAL USAGE RATES BY THE CUSTOMER.

DOCUMENT FOLDER



MAR 2 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

C-20065930

Formal Complaint Form

RECEIVED

2006 FEB 24 PM 8:37

PA P.U.C. SECRETARY'S BUREAU

Please print or type.

123100

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

State YMCA of Pennsylvania, Inc.
c/o Barry M. Martin, CEO
103 Sunset Ave
Harrisburg, PA 17112

Dauphin County

717-652-9585

Utility Account Number 209 436 2280 13

ORIGINAL

2006 FEB 17 AM 9:10
SECRETARY'S BUREAU

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name

Street/P.O. Box

City State Zip

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: U.G.I. Gas Service

3. TYPE OF UTILITY (check one)

- ELECTRIC
GAS
WATER
TELEPHONE
STEAM HEAT
WASTE WATER
MOTOR CARRIER
(taxi, moving company, limousine)

Handwritten initials/signature

4. **COMPLAINT** (check one)

A. **In general, what is your complaint?**

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other.
(explain)

2005 FEB 17 PM 9:19
SECRET

B. **State the facts of your complaint.**

The gas bill for the period of 10/11/2005 – 11/09/2005 indicated an increase in usage of 141% over the same period the previous year despite an increase in the average daily temperature from 50 to 53 degrees. The bill indicated we used 0.53 mcf/day in 2005 vs. 0.22 mcf/day in 2004. The only periods in the previous year with similar usage amounts were Jan, Feb, and Mar of 2005 with average daily temps of 34, 26, and 31 degrees respectively. We called UGI for a meter reading on 12/05/2005 which they claimed confirmed the original bill. We further asked for the meter to be removed and checked for accuracy and UGI reported it was working properly. Despite their assurances, I do not believe that this passes the common sense test. We use Gas for heating purposes only. Considering the 53 degree average temperature for the month of September, it seems obvious that the heating requirements will not be nearly as high as the 34, 26, and 31 degree months of January-March. I have included a chart comparing MCF usage rates and Average Daily Temps for the two months prior to and the two months following the period in question along with copies of the UGI statements. Note that December of 2005 is low vs. 2004 due to a 2 week shut down of the building for the holidays.

5. **RELIEF**

We are lodging this complaint on principle as well as for financial considerations. Therefore the relief we seek is two-fold:

1. We are seeking an adjustment of the bill for the period in question to bring it into line with the historical usage rates for the same period.
2. We are asking that UGI put systems in place to flag for review all past and future customer statements that show unusual patterns of reported usage as compared to historical usage rates by that customer. If a significant class of customers is identified UGI should be ordered to make restitution by adjusting the accounts of their customers.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company **AND** your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

NO

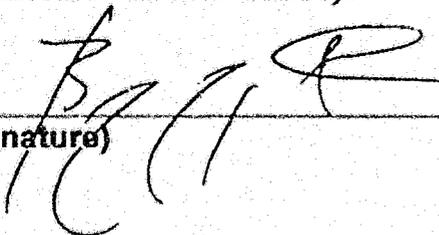
If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I Barry M. Martin on behalf of the State YMCA of Pennsylvania, hereby state that the facts above set forth are true and correct (or 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).


(Signature)

2/21/06
(Date)

9. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
--	--

Facsimiles and/or electronic filings of the complaint form will not be accepted.

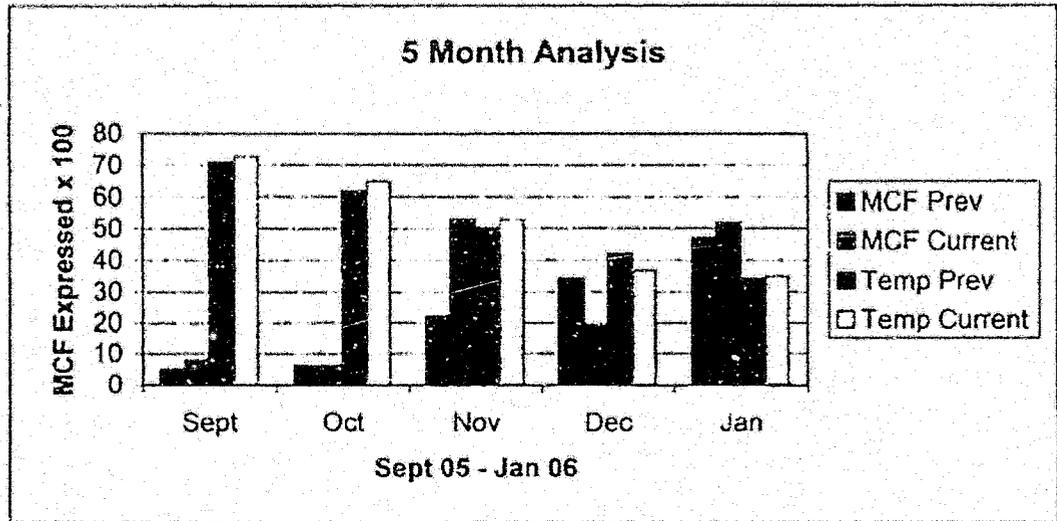
If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

MCF Used	
Prev.	Current
0.05	0.08
0.06	0.06
0.22	0.53
0.34	0.19
0.47	0.52

Temp Difference	MCF Difference
2	0.03
3	0
3	0.31
-5	-0.15
1	0.05

Daily temp	
Prev.	Current
71	73
62	65
50	53
42	37
34	35





Billing Summary for Service to:
 STATE YMCA OF PA, INC
 LARRY BOCK
 103 SUNSET AVE
 HARRISBURG PA 17112

Rate Classification:
 Rate N-Comm Gen Svc-Heating
Billing Period:
 12/13/2005 to 01/12/2006 (30 days)
 Company Read

Questions?
 Call 717-232-1811 or write to UGI at
 PO BOX 13009
 Reading, PA 19612-3009

*Your current UGI charges include
 State taxes totaling \$ 26.06
 CPT 209 436 2280 13 1

Past Bill Information - UGI Utility
 The account balance on last bill was \$ 382.43
 Payments 0.00
 Balance as of 01/16/2006 (due now) 382.43

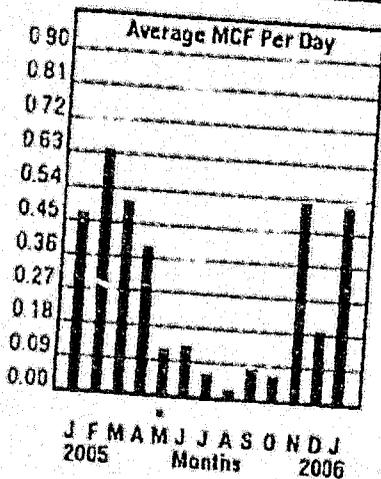
Customer Number /aid
 209 436 2280 13 /9.49

Current Bill Information - UGI Utility
 Customer Charge 8.55
 Commodity Charge (155 CCF at \$1.27142) 197.07
 Distribution Charges 77.25
 PA State Tax Surcharge -0.34
 PA Sales Tax 16.96
 Total Current Charges - UGI Utility 299.49
 UGI Utility charges owed this bill 299.49
 Total Amount Due - Please Pay by Due Date (02/01/2006) \$ 681.92
 Total Amount Due \$ 681.92

6625

006

6625



J F M A M J J A S O N D J
 2005 Months 2006

* = Estimated Usage

Average	Last Year	This Year
MCF/day	0.47	0.52
Daily temperature	34°F	35°F

Meter Information - Next Read Date February 10, 2006

Meter Number	Previous Reading	Present Reading	CCF Used	MCF Used
1366590	0	39	39	3.9
prior meter	2919	3035	116	11.6
TOTAL			155	15.5

AMOUNT
 ***\$299.49

Messages from UGI

- Your current price to compare is \$ 12.7139 /MCF.
- Your total annual usage is 98.0 MCF. Your average monthly usage is 8.1 MCF.
- Help prevent pipeline damage, accidents and service disruptions. If you see someone digging near your home please call UGI.

TURE

6625

If you pay at a payment agent please take your entire bill. Make check payable to UGI.
 Keep this part for your records. Important information is on the back of this bill. 0, 2006

Item to be Paid - Description
 Gas Service

Check Amount \$299.49
 Discount Taken
 Amount Paid 299.49



Billing Summary for Service to:
 STATE YMCA OF PA, INC
 LARRY BOCK
 103 SUNSET AVE
 HARRISBURG PA 17112

Rate Classification:
 Rate N-Comm Gen Svc Heating
Billing Period:
 11/09/2005 to 12/13/2005 (34 days)
 Company Read
Questions?
 Call 717-232-1811 or write to UGI at
 PO BOX 13009
 Reading, PA 19612-3009
 Your current UGI charges include
 State taxes totaling \$ 10.56.
 CPT 209 436 2280 13 1

Past Bill Information - UGI Utility
 The account balance on last bill was \$ 261.09
 Payments 0.00
 Balance as of 12/14/2005 (due now) 261.09

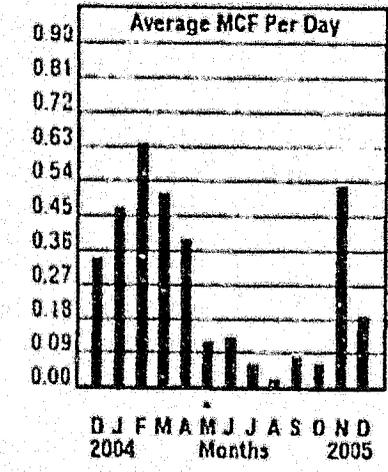
Customer Number
 209 436 2280 13

2006

6624

amt Paid
 121.34

Current Bill Information - UGI Utility
 Customer Charge 8.55
 Commodity Charge (65 CCF at \$ 1.16046) 75.43
 Distribution Charges 30.65
 PA State Tax Surcharge 0.15
 PA Sales Tax 6.87
 Total Current Charges - UGI Utility 121.34
 UGI Utility charges owed this bill \$ 382.43
 Total Amount Due, Please Pay by Due Date (01/03/2006) \$ 382.43



Meter Information - Next Read Date January 12, 2006

Meter Number	Previous Reading	Present Reading	CCF Used	MCF Used
1125279	2854	2919	65	6.5

Messages from UGI

- Your current price to compare is \$ 12.7139 /MCF.
- Your total annual usage is 98.5 MCF. Your average monthly usage is 8.2 MCF.
- Help prevent pipeline damage, accidents and service disruptions. If you see someone digging near your home please call UGI.

AMOUNT
 *****\$121.34

Average	Last Year	This Year
MCF/day	0.34	0.19
Daily temperature	42°F	37°F

UGI UTILITIES

If you pay at a payment agent please take your entire bill. Make check payable to UGI.
 Keep this part for your records. Important Information is on the back of this bill.
 Check Number: 0024
 Check Date: Jan 30, 2006

6624

Item to be Paid - Description
 Gas Service

Check Amount \$121.34
 Discount Taken
 Amount Paid 121.34



Billing Summary for Service to:
 STATE YMCA OF PA INC
 LARRY BOCK
 103 SUNSET AVE
 HARRISBURG PA 17112

Rate Classification:
 Rate N Comm Gen Svc-Heating
Billing Period:
 08/11/2005 to 09/21/2005 (41 days)
 Company Read
Questions?
 Call 717-232-1811 or write to UGI at
 PO BOX 13009
 Reading, PA 19612-3009

* Your current UGI charges include
 State taxes totaling \$ 5.55.
 CPT 209 436 2280 13 1

Correcting Bill - See Messages

Past Bill Information - UGI Utility
 The account balance on last bill was \$ 803.12
 Payments 0.00
 Adjustments -803.12
 Balance as of 09/23/2005 0.00

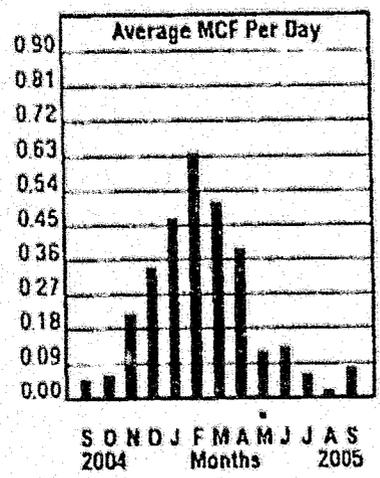
Customer Number
 209 436 2280 13

15
 uid
 1.76

Current Bill Information - UGI Utility
 Customer Charge 11.69
 Commodity Charge (33 CCF at \$1.01576) 33.52
 Distribution Charges 14.99
 PA State Tax Surcharge -0.05
 PA Sales Tax 3.61
 Total Current Charges - UGI Utility 63.76
 UGI Utility charges owed this bill \$ 63.76
 Total Amount Due, Please Pay by Due Date (10/11/2005) \$ 63.76

6512

IV
 PA
 TO
 OR
 OF



Meter Information - Next Read Date October 11, 2005

Meter Number	Previous Reading	Present Reading	CCF Used	MCF Used
1125279	2656	2689	33	33

Messages from UGI

- Your current price to compare is \$ 10.9184 /MCF.
- Your total annual usage is 94.0 MCF. Your average monthly usage is 7.8 MCF.
- This bill replaces your most recent bill. We billed it using the wrong meter reading.
- Help prevent pipeline damage, accidents and service disruptions. If you see someone digging near your home please call UGI.

AMOUNT
 \$ 63.76



Average	Last Year	This Year
MCF/day	0.05	0.08
Daily temperature	71°F	73°F

6512

If you pay at a payment agent please take your entire bill. Make check payable to UGI.
 Keep this part for your records. Important information is on the back of this bill.
 Check Date: Oct 9, 2005

Item to be Paid - Description	Check Amount	Discount Taken	Amount Paid
Gas Service	\$ 63.76		63.76



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

February 21, 2006

IN REPLY PLEASE
REFER TO OUR FILE NUMBER

STATE YMCA OF PENNSYLVANIA INC
C/O BARRY M MARTIN CEO
103 SUNSET AVENUE
HARRISBURG PA 17112

Dear Sir/Madam:

We are returning your formal complaint form to you because there is additional information needed to process the complaint. Please follow the colored tabs marked missing information or original signature. Fill in the information requested and return them to the address listed at the top of this letter.

We are granting a 15-day extension from the date of this letter for the form to be returned. Please return the forms to us no later than Wednesday, March 8, 2006.

Once we receive the formal with the information required we will be able to process your complaint. Thank you for your cooperation in this matter.

Very truly yours,

James J. McNulty
Secretary

Enclosures

anc

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 3, 2006

DOCUMENT
FOLDER

STATE YMCA OF PENNSYLVANIA, INC.
C/O BARRY M. MARTIN, CEO
Complainant

v.

Complaint Docket
No: C-20065930



MAR 2 2006

UGI CORPORATION
Respondent

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: UGI CORPORATION

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: March 3, 2006

C-20065930

UGI CORPORATION
PO BOX 13009
READING PA 19612-3009

DOCUMENT
FOLDER

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by STATE YMCA OF PENNSYLVANIA, INC. C/O BARRY M. MARTIN, CEO. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

March 3, 2006

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,

James J. McNulty
Secretary

ane

LARRY R. CRAYNE
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lcrayne@adelphia.net

(412) 425-4029 (m)
(412) 831-5462 (h)

March 23, 2006

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

ORIGINAL

RECEIVED

MAR 23 2006

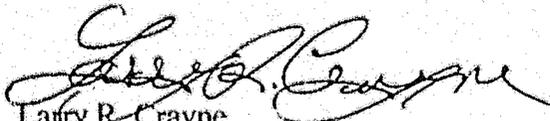
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: State YMCA of Pa., Inc. v. UGI Utilities, Inc.
Complaint Docket No. C-20065930

Dear Mr. McNulty:

Enclosed are an original and four copies of UGI Utilities, Inc's Answer to the referenced Formal Complaint. Please file the original and three copies of the Answer and return a date-stamped copy to me in the envelope provided for your convenience. A copy of the document has been served on the complainant.

Sincerely,


Larry R. Crayne

DOCUMENT
FOLDER

enclosure

cc: State YMCA of PA., Inc.
C/O Barry M. Martin, CEO
103 Sunset Ave.
Harrisburg, PA 17112

67

ORIGINAL
RECEIVED

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

MAR 23 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In the Matter of:

State YMCA of Pennsylvania, Inc.
Complainant,

Complaint Docket
No. C-20065930

VS.

DOCUMENT
FOLDER

UGI Utilities, Inc.
Respondent.

Answer To Formal Complaint

And Now comes Respondent, UGI Utilities, Inc. (UGI), and states and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
- 4.A. Admitted.

DOCKETED
MAR 30 2006

4.B. Admitted that the gas bill for the period of 10/11/2005 – 11/09/2005 exhibited an increase. In response, UGI avers that monthly bills can exhibit considerable variation based on weather and, often more importantly, customers' consumption patterns and activities and that Complainant is better able to explain why the November 2004 and 2005 bills exhibited a variance. Nevertheless, UGI avers that when Complainant's consumption for the periods of November 10, 2003 through March 2, 2004, November 8, 2004 through March 2, 2005 and November 9, 2005 through March 3, 2006 are compared, the bills exhibit a remarkable consistency of consumption. Further, Complainant's meter was removed and replaced on January 3, 2006. The removed meter was tested by UGI on January 11, 2006 and found to be registering consumption almost perfectly within the Commission's accuracy guidelines. Complainant was provided with a written report of the results of the meter test. UGI avers that that the bills rendered to Complainant are correct as rendered.

5. Paragraph 5. is a prayer for relief; therefore, no answer is required. Nevertheless, by way of a further and more complete answer, UGI avers that a sophisticated computerized program is already in place to "show unusual patterns of reported usage". The program utilizes

comparisons that are more accurate and reliable than the two-month comparison utilized by Complainant.

6. No answer required.
7. Admitted.

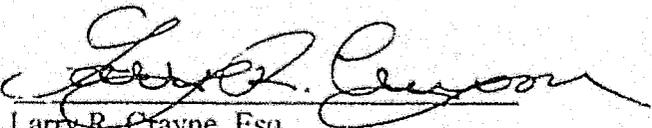
Request For Telephonic Hearing

UGI hereby requests that any hearings to be scheduled in this proceeding be conducted telephonically.

Respectfully submitted,

UGI, Utilities, Inc.

By:


Larry R. Crayne, Esq.

VERIFICATION

I, Peter G. Terranova, Vice President – Operations, UGI Utilities, Inc., hereby state that the facts set forth above 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).

Peter Terranova

Peter G. Terranova

3-23-2006

Date

msf

RECEIVED

MAR 28 2006

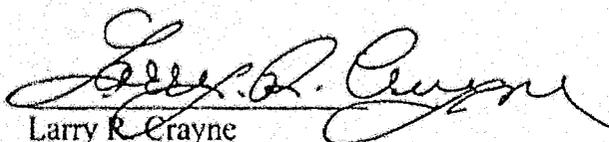
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (relating to service by a participant).

State YMCA of PA., Inc.
C/O Barry M. Martin, CEO
103 Sunset Ave.
Harrisburg, PA 17112

Dated this 23rd day of Mar, 2006



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.



We build strong kids,
strong families, strong communities

March 29, 2006

James J. McNulty, Secretary
Pennsylvania PUC
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Complaint Docket # C-20065930

Dear Sir,

In response to the "Answer to the Formal Complaint" filed March 23, 2006 by UGI Utilities, Inc:

Paragraph 4B

No written communication from UGI was ever received regarding this matter until the referenced response to our complaint arrived on March 29, 2006. UGI has shown a blatant disregard for listening to our concerns until we got their attention with a formal complaint. In addition to their contempt for their customers, the response tendered by UGI is attempting to mislead the PUC.

Case in point: "UGI avers that monthly bills can exhibit considerable variation based on weather" yet as indicated in our original complaint the average daily temperature as reported on the invoices provided by UGI actually increased for the period in question.

Case in point: UGI "Admitted that the gas bill...exhibited an increase". An increase from .22 mcf/day to .53 mcf/day or 141% is not just as increase it is a substantial increase.

Case in Point: UGI admits that when 3 years of consumption are compared, that there is a "remarkable consistency of consumption". What they do not say is that the consistency exists for EVERY billing cycle EXCEPT the one in question which is central to our claim the bill is out of the range of normal variances.

Paragraph 5

It does not require a "sophisticated computerized program" to spot when a customer with "remarkable consistency of consumption" has a one month increase of 141%.

State YMCA of Pennsylvania, Inc.
103 Sunset Avenue • Harrisburg, Pennsylvania 17112
Telephone (717) 652-9585

YMCA mission: To put Christian principles into practice through programs that build healthy spirit, mind and body for all.

RECEIVED
2006 MAR 30 AM 9:06
PA P.U.C.
SECRETARY'S BUREAU

DOCUMENT
FOLDER

DOCKETED
MAR 31 2006

ORIGINAL

1

Request for Additional Independent Testing

We request that the PUC order independent testing of the original meter at UGI's expense and compel them to provide a written report of the test to all parties.

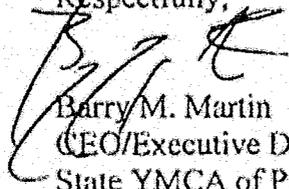
Request for Delay of Hearing

We respectfully request a delay in the scheduling of the hearing until such time as the Respondent provides a written report of the alleged meter tests as well as any tests ordered by the PUC as a result of the aforementioned request.

Request to Deny Telephonic Hearing

We request that you deny Respondent's request for a telephonic hearing and require all parties to be in attendance in Harrisburg, PA on such a date as determined by the PUC.

Respectfully,



Barry M. Martin
CEO/Executive Director
State YMCA of PA, Inc.

CC: Larry R. Crane, Esq.
Counsel for UGI Utilities
238 Johnston Rd
Pittsburgh, PA 15241