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File #: 169472

June 28, 2017

VIA ELECTRONIC FILING

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

**Re: Pennsylvania Public Utility Commission, Office of Consumer Advocate & Office of Small Business Advocate v. UGI Utilities, Inc. - Gas Division
Docket Nos. R-2017-2602638, C-2017-2603457 & C-2017-2604098**

**Pennsylvania Public Utility Commission, Office of Consumer Advocate & Office of Small Business Advocate v. UGI Central Penn Gas, Inc.
Docket Nos. R-2017-2602627, C-2017-2603574 & C-2017-2604117**

**Pennsylvania Public Utility Commission, Office of Consumer Advocate & Office of Small Business Advocate v. UGI Penn Natural Gas, Inc.
Docket Nos. R-2017-2602633, C-2017-2603489 & C-2017-2604132**

Dear Secretary Chiavetta:

Enclosed for filing is the Joint Petition of UGI Utilities, Inc. – Gas Division, UGI Central Penn Gas, Inc., and UGI Penn Natural Gas, Inc. for a Protective Order in the above-referenced proceedings. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

Rosemary Chiavetta, Secretary
June 28, 2017
Page 2

cc: Honorable Steven K. Haas
Certificate of Service

CERTIFICATE OF SERVICE

(Docket Nos. R-2017-2602638, et al.)
(Docket Nos. R-2017-2602627, et al.)
(Docket Nos. R-2017-2602633, et al.)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Lauren M. Burge, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166

Steven C. Gray, Esquire
Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Date: June 28, 2017



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602638
Office of Consumer Advocate	:	C-2017-2603457
Office of Small Business Advocate	:	C-2017-2604098
v.	:	
UGI Utilities, Inc. – Gas Division § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602627
Office of Consumer Advocate	:	C-2017-2603574
Office of Small Business Advocate	:	C-2017-2604117
v.	:	
UGI Central Penn Gas, Inc. § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602633
Office of Consumer Advocate	:	C-2017-2603489
Office of Small Business Advocate	:	C-2017-2604132
v.	:	
UGI Penn Natural Gas, Inc. § 1307(f)	:	

**JOINT PETITION OF
UGI UTILITIES, INC. – GAS DIVISION,
UGI CENTRAL PENN GAS, INC., AND
UGI PENN NATURAL GAS, INC.
FOR A PROTECTIVE ORDER**

TO ADMINISTRATIVE LAW JUDGE STEVEN K. HAAS:

Pursuant to 52 Pa. Code §§ 5.41 and 5.365, UGI Utilities, Inc. – Gas Division (“UGI”), UGI Central Penn Gas, Inc. (“CPG”), and UGI Penn Natural Gas, Inc. (“PNG”) (collectively, the “Companies”), hereby respectfully request the issuance of a protective order with respect to confidential or proprietary information that might need to be filed with the Commission, produced in discovery, or otherwise introduced into the record in the above-captioned proceedings. In support thereof, the Companies state as follows:

I. BACKGROUND

1. The Companies, being natural gas distribution companies with gross intrastate annual operating revenues in excess of \$40 million, are authorized by the provisions of Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f), and the Pennsylvania Public Utility Commission's ("Commission") gas cost recovery regulations at 52 Pa. Code §§ 53.61-53.69, to make annual purchase gas cost ("PGC") filings proposing modifications to their gas tariff rates to reflect increases or decreases in their natural gas costs.

2. On May 1, 2017, the Companies made their PGC 30-day pre-filings with the Commission in compliance with Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f), and the Commission's regulations at 52 Pa. Code §§ 53.64, 53.65.

3. On June 1, 2017, the Companies filed with the Commission their definitive PGC filings, including supporting information required by the Commission's regulations, the Companies' direct testimony and exhibits, and the Companies' Pro Forma Tariff Supplements reflecting actual and projected changes in natural gas costs.

4. During the course of this proceeding, it may be necessary for participants to disclose confidential or proprietary information in filings with the Commission, through discovery responses or through evidence introduced into the record.

5. Confidential and proprietary information may include, but not be limited to: (1) confidential customer information; (2) proprietary bids submitted by wholesale suppliers or asset managers for PGC supplies or services; or (3) information pertaining to specific gas supply contractual arrangements or payments that could potentially be misused by wholesale market participants to gain an unfair advantage in such markets.

6. Under 52 Pa. Code § 5.365, the presiding Administrative Law Judge may issue a Protective Order to limit or prohibit disclosure of confidential and proprietary information where “the potential harm to the party providing the information would be substantial and ... the harm to the party if the information is disclosed without restriction outweighs the public’s interest in free and open access to the administrative hearing process.”

7. In applying this standard, relevant factors to be considered include: (1) the extent to which disclosure would cause unfair economic or competitive damage; (2) the extent to which the information is known by others and used in similar activities; (3) the worth or value of the information to the party and to the party’s competitors; (4) the difficulty and costs of developing the information; and (5) other statute and regulations dealing specifically with disclosure of the information. 52 Pa. Code § 5.365(a)(1)-(5).

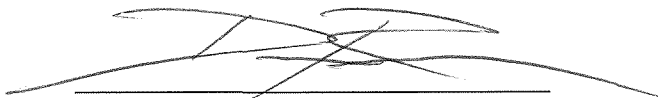
8. The release, in the current PGC proceedings, of non-public information such as customer-specific usage information, information concerning the specifics of proprietary bids or offers submitted by wholesale suppliers or asset managers, or information pertaining to specific gas supply contractual arrangements or payments could cause unfair economic or competitive damage to the Companies and their customers by giving wholesale or retail suppliers an unfair competitive advantage in the marketplace and by discouraging the submission of the lowest cost bids (or any bids at all) by potential suppliers in response to Company requests.

9. Conversely, the language proposed in the attached Protective Order protects against overly broad designations of protected information by giving all parties the right to “question or challenge the confidential or proprietary nature” of information marked as “Confidential” by a producing party.

10. The limitation on the disclosure of proprietary information proposed in the attached Protective Order fairly balances the interests of the parties, the public, and the Commission and will not prejudice the rights of the participants to develop a full record or frustrate the prompt and fair resolution of this proceeding.

WHEREFORE, the Companies respectfully request that Administrative Law Judge Steven K. Haas issue a protective order substantially in the form attached in **Exhibit A** to this Petition.

Respectfully submitted,



Danielle Jouenne (ID # 306839)
UGI Corporation
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Phone: 610-992-3203
Fax: 610-992-3258
E-mail: jouenned@ugicorp.com

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Counsel for UGI Utilities, Inc. – Gas Division,
UGI Central Penn Gas, Inc., and UGI Penn
Natural Gas, Inc.

Date: June 28, 2017

EXHIBIT A
Protective Order

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602638
Office of Consumer Advocate	:	C-2017-2603457
Office of Small Business Advocate	:	C-2017-2604098
v.	:	
UGI Utilities, Inc. – Gas Division § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602627
Office of Consumer Advocate	:	C-2017-2603574
Office of Small Business Advocate	:	C-2017-2604117
v.	:	
UGI Central Penn Gas, Inc. § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2017-2602633
Office of Consumer Advocate	:	C-2017-2603489
Office of Small Business Advocate	:	C-2017-2604132
v.	:	
UGI Penn Natural Gas, Inc. § 1307(f)	:	

PROTECTIVE ORDER

AND NOW, this ____ day of June, 2017, upon consideration of the Joint Petition of UGI Utilities, Inc. - Gas Division (“UGI”), UGI Central Penn Gas, Inc. (“CPG”), and UGI Penn Natural Gas, Inc. (“PNG”), for a Protective Order, such Petition is hereby granted. Therefore, it is ORDERED that:

1. This Protective Order dated June ___, 2017, in this matter, is hereby granted with respect to all materials and information identified at Paragraphs 2 and 5 of this Protective Order, which are filed with the Pennsylvania Public Utility Commission (“Commission”), produced in discovery, or otherwise presented during these proceedings. All persons now and hereafter granted access to the materials and information identified in Paragraphs 2 and 5 of this Protective Order shall use and disclose such information only in accordance with this Order.

2. The materials subject to this Order are all correspondence, documents, data, information, studies, methodologies and other materials that a party or an affiliate of a party furnishes in this proceeding pursuant to Commission rules and regulations, discovery procedures or cross-examination or provides as a courtesy to a party to this proceeding, which are claimed to be of a proprietary or confidential nature and which are designated "CONFIDENTIAL" (hereinafter collectively referred to as "Proprietary Information").

3. Proprietary Information shall be made available to the Commission and its Staff for use in this proceeding, including counsel for and non-lawyer experts engaged by the Bureau of Investigation and Enforcement ("I&E"). For purposes of filing, to the extent that Proprietary Information is placed in the Commission's report folders, such information shall be handled in accordance with routine Commission procedures inasmuch as the report folders are not subject to public disclosure. To the extent that Proprietary Information is placed in the Commission's testimony or document folders, such information shall be separately bound, conspicuously marked, and accompanied by a copy of this Order. Public inspection of Proprietary Information shall be permitted only in accordance with this Protective Order.

4. In addition to I&E personnel identified in Paragraph 3, Proprietary Information shall also be made available to: (a) the Consumer Advocate; (b) the Small Business Advocate; (c) each party's counsel of record; and (d) the party's witness(es) or expert(s), to the extent required and for the limited purpose of participation in the above-captioned proceedings, who comply with the provisions of Paragraph 9 hereof.

5. The parties may also designate certain Proprietary Information as Highly Confidential Information, which shall be marked for the record as "HIGHLY CONFIDENTIAL," consisting of materials that are claimed to be of an extremely sensitive nature. Highly Confidential Information shall include, but not be limited to: (a) information about the identity and usage characteristics of specific customers that the Companies are not otherwise authorized to release; and (b) specific wholesale supplier bid information or related information that could give wholesale suppliers an unfair competitive advantage.

6. Highly Confidential information shall be provided in the same manner and to the same parties as referenced in Paragraphs 3 and 4 above, except that Highly Confidential Information shall not be provided to a party witness or expert who individually serves as a witness or expert for, or as a consultant or advisor to: (a) a transportation customer or group of transportation customer receiving transportation service on a UGI, CPG, or PNG distribution system; (b) a wholesale gas supplier or group of wholesale gas suppliers, as set forth on Exhibit 1 of Appendix A; or (c) a retail gas supplier or group of retail gas suppliers currently identified on the Commission's natural gas supplier list as of the date of this Order.

7. If a party's witness or expert knows that another member of the witness or expert's firm also serves as a witness or expert for, or as a consultant or advisor to: (a) a transportation customer or group of transportation customers receiving transportation service on a Company distribution system or a wholesale gas supplier or group of wholesale gas suppliers, as set forth on Exhibit 1 to Appendix A; or (b) a retail gas supplier or group of retail gas suppliers currently identified on the Commission's natural gas supplier list as of the date of this Order, the witness or expert must: (1) advise the producing party of the relationship; (2) make reasonable attempts to segregate those personnel assisting in the witness's or expert's participation in this proceeding from those personnel working on behalf of these entities; and (3) if segregation of such personnel is impractical, give to the producing party written assurances that the lack of segregation will in no way jeopardize the interests of the producing party. The producing party retains the right to challenge the adequacy of the written assurances that its interests will not be jeopardized or the accuracy or the assurances provided through the submission of an executed Appendix A as provided in Paragraph 9 hereof.

8. No other persons may have access to the Proprietary Information or Highly Confidential Information except as authorized by Order of the Commission or the presiding Administrative Law Judge. No person who may be entitled to receive or who is afforded access to any Proprietary Information or Highly Confidential Information shall use or disclose such information for the purposes of business or competition or any purpose other than

the preparation for and conduct of this proceeding or any administrative or judicial review thereof.

9. Prior to making Proprietary Information or Highly Confidential Information available to any person as provided above, counsel shall deliver a copy of this Order to such person and, except for employees of I&E, shall receive a written acknowledgment from that person in the form attached to this Order and designated as "Appendix A." Counsel for the non-producing party shall promptly deliver to the producing party a copy of the executed Appendix A.

10. A producing party shall designate data or documents as constituting or containing Proprietary Information or Highly Confidential Information by affixing, as appropriate, a CONFIDENTIAL or HIGHLY CONFIDENTIAL stamp or typewritten or printed designation on such data or documents. Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information or Highly Confidential Information, the producing party, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents which constitute or contain Proprietary Information or Highly Confidential Information.

11. Any federal agency which has access to and/or receives copies of the Proprietary Information or Highly Confidential Information will consider and treat such information as within the exemption from disclosure provided in the Freedom of Information Act as set forth at 5 U.S.C. § 552(b)(4) until such time as the information is found to be non-proprietary.

12. Any state agency which has access to and/or receives copies of the Proprietary Information or Highly Confidential Information will consider and treat such information as within the exemption from disclosure provided in the Pennsylvania Right to Know Law, Act of February 14, 2008, P.L. 6, 65 P.S. §§ 67.101-67.3104 until such time as the information is found to be non-proprietary.

13. Any public reference to Proprietary Information or Highly Confidential Information by counsel or persons afforded access thereto shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information or Highly Confidential Information to fully understand the reference and not more. The Proprietary Information or Highly Confidential Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.

14. Parts of any record of this proceeding containing Proprietary Information or Highly Confidential Information, including but not limited to all exhibits, writings, testimony, cross examination, argument and responses to discovery, and including reference thereto as specified in number Paragraph 13 above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information or Highly Confidential Information is released from the restrictions of this Order, either through the agreement of the parties or pursuant to order of the Administrative Law Judge or the Commission.

15. The parties affected by the terms of this Order shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information or Highly Confidential Information; to question or challenge the admissibility of Proprietary Information or Highly Confidential Information; to refuse or object to the production of Proprietary Information or Highly Confidential Information on any proper ground, including but not limited to irrelevance, immateriality, or undue burden; to seek an order permitting disclosure of Proprietary Information or Highly Confidential Information beyond that allowed in this Order; and to seek additional measures of protection of Proprietary Information or Highly Confidential Information beyond those provided in this Order. If a challenge is made to the designation of a document or information as Proprietary Information or Highly Confidential Information, the party claiming that the information is Proprietary Information or Highly Confidential Information shall carry the burden of demonstrating that the designation is necessary and appropriate.

16. Unresolved challenges arising under Paragraphs 7 or 15 shall be decided on motion or petition by the presiding officer or the Commission in conformity with applicable rules, regulations, orders, statutes, precedent, etc., to the extent that such guidance is available.

17. Except in the case of Proprietary Information or Highly Confidential Information provided by the Companies to the OCA, I&E or OSBA, upon completion of this proceeding, including any administrative or judicial review, all copies of all documents and other materials, including notes, which contain any Proprietary Information or Highly Confidential Information, shall be immediately returned upon request to the party furnishing such information. In the alternative, parties may provide an affidavit of counsel affirming that the materials containing or reflecting Proprietary Information or Highly Confidential Information have been destroyed.

Dated: June , 2017

Steven K. Haas
Administrative Law Judge

**APPENDIX A
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : Docket Nos. R-2017-2602638
 Office of Consumer Advocate : C-2017-2603457
 Office of Small Business Advocate : C-2017-2604098
 v. :
 UGI Utilities, Inc. – Gas Division § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2017-2602627
 Office of Consumer Advocate : C-2017-2603574
 Office of Small Business Advocate : C-2017-2604117
 v. :
 UGI Central Penn Gas, Inc. § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2017-2602633
 Office of Consumer Advocate : C-2017-2603489
 Office of Small Business Advocate : C-2017-2604132
 v. :
 UGI Penn Natural Gas, Inc. § 1307(f) :

TO WHOM IT MAY CONCERN:

The undersigned is the _____ of _____ (the retaining party) and does not hold the following positions with any entity listed on the Supplier List, attached hereto as Exhibit 1 to this Appendix, or an entity listed on the Commission’s natural gas supplier list as of the date of this Agreement, attached hereto as Exhibit 2: an officer, board member, significant stockholder, partner, owner (other than owner of stock) or an employee; provided, however, that any witness or expert shall not be disqualified on account of being a stockholder, partner, or owner unless his or her interest in the business constitutes a significant potential for violation of the limitations of permissible use of the Proprietary Information.

The undersigned has read and understands the Protective Order that deals with the treatment of Proprietary Information. The undersigned agrees to be bound by, and comply with, the terms and conditions of said Order. In the case of a witness or expert, the undersigned represents that he or she has complied and will continue to comply with the provisions of numbered Paragraphs 6 and 7 of the Order.

SIGNATURE

PRINT NAME

ADDRESS

EMPLOYER

DATE: _____

APPENDIX A

EXHIBIT 1

MULTI-COMPANY MARKETER CONTACT LIST

Exhibit 1 to Appendix A

UGI Utilities, Inc., UGI Central Penn Gas, Inc. and UGI Penn Natural Gas, Inc. Multi-Company Marketer Contact List

Last Updated: May 22, 2017 07:05:01 PM

Company Index:

Ambit Northeast, LLC
American Power & Gas of Pennsylvania
Amerigreen Energy, Inc.
Anadarko Energy Services Company
Anahau Energy, LLC
Antero Resources Corporation
Apache Corporation
Associated Energy Services, Division of Spark Energy Gas, LP
Baltimore Gas & Electric Company
BG Energy Merchants, LLC
BioUrja Trading, LLC
BNP Paribas Energy Trading GP
BP Energy Company
Cabot Oil & Gas Corporation
Calpine Energy Services, L.P.
Cargill, Incorporated
Centerpoint Energy Services, Inc.
Central Crude, Inc.
Cheniere Marketing, Inc
Chesapeake Energy Marketing , L.C.C.
Chevron Natural Gas, division of Chevron, U.S.A., Inc.
Chief Oil & Gas LLC
CIMA Energy, LTD.
Cimarex Energy Services, Inc.
Citrus Energy Corporation (dba Clearwater Enterprises, LLC)
Clearwater Enterprises, L.L.C.
CNX Gas Company LLC
Cokinos Energy Corporation
Colonial Energy, Incorporated
Concord Energy LLC
ConocoPhillips Company
Delta Energy, LLC
Devon Gas Services, L.P.
Direct Energy Business Marketing, LLC
Dominion Field Services
Dominion Retail, Incorporated
DTE Energy Trading, Inc.
eCorp Energy Marketing, LLC
EDF Trading North America, LLC
Emera Energy Services, Inc.
Enable Energy Resources LLC
Enbridge Marketing (U.S.) LP

Encana Marketing (USA) Inc.
Enerplus Resources (USA) Corporation
EnLink Gas Marketing, LP
Enterprise Products Operating LLC
EOG Resources, Inc.
EQT Energy, LLC
eServices, LLC
Exelon Generation Company, LLC
Fairman Corporation
Freepoint Commodities LLC
Frontera Gas Supply, Inc.
Gateway Energy Services Corporation
Glacial Natural Gas, Incorporated
Green Plains Trade Group, LLC
Infinite Energy, Inc.
J. Aron & Company
JLA Energy LLC
JP Morgan Ventures Energy Corporation
Macquarie Energy, LLC
Magnus Energy Marketing, Ltd
Major Energy Services LLC
Metromedia Energy, Incorporated
MIECO Inc.
Mitsui & Co. Energy Marketing and Services (USA) Inc.
Morgan Stanley Capital Group Inc.
Murphy Exploration & Production Company - USA
National Energy & Trade, LP
New Jersey Natural Gas Company
NextEra Energy Marketing, LLC
Nittany Energy LLC
NJR Energy Services Company
Occidental Energy Marketing. Inc.
One Nation Energy Solutions, LLC
Pacific Summit Energy LLC
Palmco Energy PA, LLC
Peninsula Energy Services Company, Inc.
Pennsylvania Gas & Electric
Pennsylvania General Energy Corp
Philadelphia Energy Solutions Refining and Marketing, LLC
Philadelphia Gas Works
Plants and Goodwin, Inc.
Plymouth Rock Energy, LLC
ProLiance Energy, LLC
Prometheus Energy Group
Range Resources - Appalachia, LLC
Repsol Energy North America Corporation
Rhoads Energy Corporation

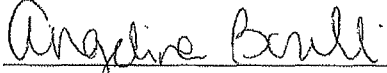
Rice Energy Marketing, LLC
Roulette Oil & Gas Co., LLC
Samson Resources Company
SEI Energy LLC
Sequent Energy Management, L.P.
SFE Energy Pennsylvania, Inc
Shell Energy North America, L. P.
Shipley Energy Company
Snyder Brothers, Inc.
South Jersey Resources Group, L.L.C.
Southwest Energy, LP
Statoil Natural Gas LLC
Superior Natural Gas Corporation
Supreme Energy, Inc.
Susquehanna Energies, Inc.
SWN Energy Services, LLC
T&F Exploration L. P.
Talen Energy Marketing, LLC
Targa Gas Marketing, LLC
Tenaska Gas Storage, LLC
Tenaska Marketing Ventures
Tiger Natural Gas, Inc.
Titan Gas and Power
Total Gas & Power North America, Inc.
Twin Eagle Resource Management, LLC
UGI Central Penn Gas, Inc.
UGI Energy Services, LLC (d.b.a. UGI EnergyLink)
UGI Penn Natural Gas, Inc.
UGI Utilities, Inc.
Ultra Resources, Inc.
United Energy Trading, LLC
Victory Energy Corporation
Virginia Power Energy Marketing, Inc.
Washington Gas Light Company
WGL Energy Services, Inc.
WGL Midstream, LLC
World Fuel Services. Inc.
Xoom Energy Pennsylvania, LLC.

VERIFICATION

I, Angelina M. Borelli, being the Director – Energy Supply and Planning at 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 if asked orally at a hearing in this matter, my answers would be as set forth therein.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: June 27, 2017



Angelina M. Borelli