



COMMONWEALTH OF PENNSYLVANIA

June 29, 2017

E-FILED

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

**Re: Petition of UGI Utilities, Inc. – Gas Division to Establish a Schedule for the Installation of Daily Metering Facilities on all Rate IS (Interruptible Service) and Rate DS (Delivery Service) Accounts; to thereafter Transfer all Rate IS and DS Customer Accounts from Intra-Month to Calendar Month Billing and Balancing Pools; and to Recover Associated Costs pursuant to 66 Pa.C.S. §2205(c)(7)
Docket No. P-2017-2607269**

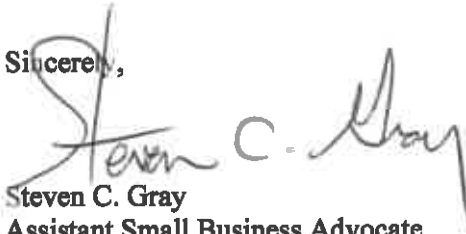
Dear Secretary Chiavetta:

I am delivering for filing today the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: The Honorable Charles E. Rainey, Jr.
Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of UGI Utilities, Inc. – Gas Division To Establish a :
Schedule for the Installation of Daily Metering Facilities on :
all Rate IS (Interruptible Service) and Rate DS (Delivery : Docket No. P-2017-2607269
Service) Accounts; to thereafter Transfer all Rate IS and DS :
Customer Accounts from Intra-Month Calendar Month :
Billing and Balancing Pools; and to Recover Associated :
Costs pursuant to 66 Pa.C.S §2205(c)(7) :**

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

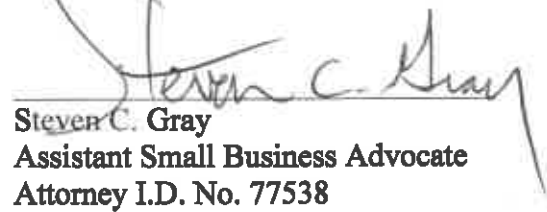
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition of UGI Utilities, Inc. – Gas Division to Establish a Schedule for Installation of Daily Metering Facilities on all Rate IS (Interruptible Service) and Rate DS (Delivery Service) Accounts; to thereafter Transfer all Rate IS and DS Customer Accounts from Intra-Month to Calendar Month Billing and Balancing Pools; and to Recover Associated Costs pursuant to 66 Pa.C.S. §2205(c)(7) (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on May, 31, 2017. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

Respectfully submitted,



Steven C. Gray
Assistant Small Business Advocate
Attorney I.D. No. 77538

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525

Date: June 29, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Utilities, Inc. – Gas Division To Establish a Schedule for the Installation of Daily Metering Facilities on all Rate IS (Interruptible Service) and Rate DS (Delivery Service) Accounts; to thereafter Transfer all Rate IS and DS Customer Accounts from Intra-Month Calendar Month Billing and Balancing Pools; and to Recover Associated Costs pursuant to 66 Pa.C.S §2205(c)(7) :
: **Docket No. P-2017-2607269**
:

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (the “Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention in the proceeding commenced by the filing of the Petition of UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) to Establish a Schedule for the Installation of Daily Metering Facilities on all Rate IS (Interruptible Service) and Rate DS (Delivery Service) Accounts; to thereafter Transfer all Rate IS and DS Customer Account from Intra-Month to Calendar Month Billing and Balancing Pools; and to Recover Associated Costs pursuant to 66 Pa.C.S. §2205(c) on May 31, 2017 (“Petition”).

The Small Business Advocate files this Notice of Intervention in order to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission

into all of the elements of the Company's Petition is necessary to ensure that the requested relief is lawful, just, reasonable, and not unduly discriminatory. Upon initial review of the Petition, the OSBA is particularly concerned with the proposed cost recovery mechanism in that it develops a charge that applies to Rates R/RT, N/NT and DS, as opposed to having these costs be borne only by the customers who have meters installed, or at least their respective rate classes.

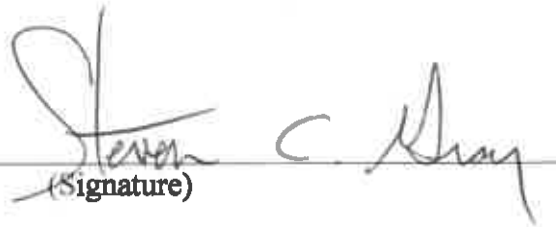
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the Petition. The Small Business Advocate will ask the Commission to deny any aspects of the Petition that apply to small business customers that are not proven by UGI Gas to be lawful, just, reasonable, and not unduly discriminatory to the Company's small business customers.

Dated: June 29, 2017

VERIFICATION

I, Steven C. Gray, hereby state that the facts set forth herein 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).

Date: June 29, 2017


(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of UGI Utilities, Inc. – Gas Division To Establish a :
Schedule for the Installation of Daily Metering Facilities on :
all Rate IS (Interruptible Service) and Rate DS (Delivery : Docket No. P-2017-2607269
Service) Accounts; to thereafter Transfer all Rate IS and DS :
Customer Accounts from Intra-Month Calendar Month :
Billing and Balancing Pools; and to Recover Associated :
Costs pursuant to 66 Pa.C.S §2205(c)(7) :**

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov
(Email and Hand Delivery)

Paul Diskin, Director
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
pdiskin@pa.gov
(Email and Hand Delivery)

Darryl Lawrence, Esquire
Lauren M. Burge, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
dlawrence@paoca.org
lburge@paoca.org
(Email and Hand Delivery)

Elizabeth R. Marx, Esquire
Patrick M. Cicero, Esquire
Joline Price, Esquire
Pennsylvania Public Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
pciceropulp@palegalaid.net
emarxpulp@palegalaid.net

Scott Granger, Esquire
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
sgranger@pa.gov
(Email and Hand Delivery)

Pamela C Polacek, Esquire
Vasiliki Karandrikas, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mcneeslaw.com
vkandrikas@mcneeslaw.com
ahylander@mcneeslaw.com

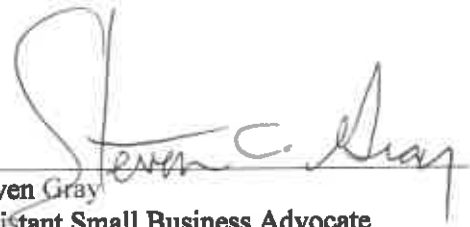
Mark C. Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
morrowm@ugicorp.com

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@aol.com

John F. Povilaitia, Esquire
Buchanan Ingersoll & Rooney
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
John.povilaitis@bipc.com

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com

DATE: June 29, 2017



Steven Gray
Assistant Small Business Advocate
Attorney I.D. No. 77538