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File #: 173594

July 3, 2018

***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: PA PUC, et al. v. UGI Utilities, Inc. - Gas Divisions  
Docket Nos. R-2018-3001633, C-2018-3001806 and C-2018-3001825**

**PA PUC, et al. v. UGI Central Penn Gas, Inc.  
Docket Nos. R-2018-3001631, C-2018-3001820 and C-2018-3001826**

**PA PUC, et al. v. UGI Penn Natural Gas, Inc.  
Docket Nos. R-2018-3001632, C-2018-3001822 and C-2018-3001827**

Dear Secretary Chiavetta:

Enclosed for filing, please find the Joint Petition of UGI Utilities, Inc. – Gas Division, UGI Central Penn Gas, Inc. and UGI Penn Natural Gas, Inc. (“UGI Companies”) for a Protective Order in the above-referenced proceeding. Prior to filing the enclosed Joint Petition, the UGI Companies consulted with counsel for the other parties. The UGI Companies’ understanding is that no parties oppose the Joint Petition.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin T. Ryan

DTR/skr  
Enclosure

Rosemary Chiavetta, Secretary  
July 3, 2018  
Page 2

cc: Honorable Steven K. Haas  
Honorable Andrew M. Calvelli  
Certificate of Service

## CERTIFICATE OF SERVICE

**Docket Nos. R-2018-3001633, R-2018-3001631, and R-2018-3001632**

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

Scott B. Granger, Esquire  
Bureau of Investigation and Enforcement  
Commonwealth of Pennsylvania  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Lauren M. Burge, Esquire  
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Office of Consumer Advocate  
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Office of Small Business Advocate  
300 North Second Street, Suite 202  
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*Counsel for UGIII and CPGLUG*

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Cambridge, MA 02140  
*Consultant for OSBA*

Date: July 3, 2018

  
Devin T. Ryan, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001633  
Office of Consumer Advocate : C-2018-3001806  
Office of Small Business Advocate : C-2018-3001825  
v. :  
UGI Utilities, Inc. – Gas Division § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001631  
Office of Consumer Advocate : C-2018-3001820  
Office of Small Business Advocate : C-2018-3001826  
v. :  
UGI Central Penn Gas, Inc. § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001632  
Office of Consumer Advocate : C-2018-3001822  
Office of Small Business Advocate : C-2018-3001827  
v. :  
UGI Penn Natural Gas, Inc. § 1307(f) :

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

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**TO ADMINISTRATIVE LAW JUDGES STEVEN K. HAAS AND ANDREW CALVELLI:**

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, 2018, 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, 2018, 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 Judges Steven K. Haas and Andrew Calvelli issue a protective order substantially in the form attached in **Exhibit A** to this Petition.

Danielle Jouenne (ID # 306839)  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406-2807  
Phone: 610-992-3203  
Fax: 610-992-3258  
E-mail: jouenned@ugicorp.com

Date: July 3, 2018

Respectfully submitted,



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Anthony D. Kanagy (ID # 85522)  
Devin T. Ryan (ID # 316602)  
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Counsel for UGI Utilities, Inc. – Gas Division,  
UGI Central Penn Gas, Inc., and UGI Penn  
Natural Gas, Inc.

**EXHIBIT A**  
**Protective Order**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2018-3001633
Office of Consumer Advocate	:	C-2018-3001806
Office of Small Business Advocate	:	C-2018-3001825
v.	:	
UGI Utilities, Inc. – Gas Division § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2018-3001631
Office of Consumer Advocate	:	C-2018-3001820
Office of Small Business Advocate	:	C-2018-3001826
v.	:	
UGI Central Penn Gas, Inc. § 1307(f)	:	

Pennsylvania Public Utility Commission	:	Docket Nos. R-2018-3001632
Office of Consumer Advocate	:	C-2018-3001822
Office of Small Business Advocate	:	C-2018-3001827
v.	:	
UGI Penn Natural Gas, Inc. § 1307(f)	:	

**PROTECTIVE ORDER**

AND NOW, this \_\_\_\_ day of July, 2018, 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 July \_\_\_, 2018, 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. Further, counsel for the Office of Consumer Advocate and the Office of Small Business Advocate may share Proprietary Information or Highly Confidential Information with the Consumer Advocate and Small Business Advocate, respectively, without obtaining a signed Appendix A from these individuals, provided, however, that these individuals otherwise abide by the terms of the Protective Order

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: July , 2018

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Steven K. Haas  
Administrative Law Judge

Andrew Calvelli  
Administrative Law Judge

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

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001633  
 Office of Consumer Advocate : C-2018-3001806  
 Office of Small Business Advocate : C-2018-3001825  
 v. :  
 UGI Utilities, Inc. – Gas Division § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001631  
 Office of Consumer Advocate : C-2018-3001820  
 Office of Small Business Advocate : C-2018-3001826  
 v. :  
 UGI Central Penn Gas, Inc. § 1307(f) :

Pennsylvania Public Utility Commission : Docket Nos. R-2018-3001632  
 Office of Consumer Advocate : C-2018-3001822  
 Office of Small Business Advocate : C-2018-3001827  
 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: 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 30, 2018

**Company Index:**

Alpha Power & Gas  
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  
Astral Energy, LLC  
Baltimore Gas & Electric Company  
BG Energy Merchants, LLC  
BioUrja Trading, LLC  
BlueRock Energy  
BNP Paribas Energy Trading GP  
BP Energy Company  
Boston Energy Trading & Marketing, LLC  
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

Constellation NewEnergy-Gas Division  
Delta Energy, LLC  
Devon Gas Services, L.P.  
Direct Energy Business Marketing, LLC  
Direct Energy Services  
Direct Energy Small Business  
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  
Everyday Energy, LLC d/b/a Energy Rewards  
Exelon Generation Company, LLC  
Fairman Corporation  
Freepoint Commodities LLC  
Frontera Gas Supply, Inc.  
Frontier Utilities Northeast, LLC  
Gateway Energy Services Corporation  
Glacial Natural Gas, Incorporated  
Globalview Software, Inc.  
Green Mountain Energy Company  
Green Plains Trade Group, LLC  
HIKO Energy, LLC  
IDT Energy, Inc.  
Infinite Energy, Inc.  
Interstate Gas Supply, Inc.  
J. Aron & Company  
JLA Energy LLC  
JOSCO Energy USA, Inc.  
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  
North American Power & Gas  
North Star Gas Company d/b/a YEP Energy  
NRG Retail Solutions  
Occidental Energy Marketing. Inc.  
One Nation Energy Solutions, LLC  
Pacific Summit Energy LLC  
Palmco Energy PA, LLC  
Park Power, 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  
PSE&G Energy Resources & Trade, LLC  
Range Resources - Appalachia, LLC  
Reliant Energy Northeast d/b/a NRG Retail Solutions  
Repsol Energy North America Corporation  
Residents Energy  
Rhoads Energy Corporation  
Rice Energy Marketing, LLC  
Roulette Oil & Gas Co., LLC  
RPA Energy  
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  
Sprague Energy Corporation

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  
Texla Energy  
Tiger Natural Gas, Inc.  
Titan Gas and Power  
Total Gas & Power North America, Inc.  
TransAlta Energy Marketing (U.S.), Inc.  
Twin Eagle Resource Management, LLC  
UGI Central Penn Gas, Inc.  
UGI Development Company  
UGI Energy Services, LLC (d.b.a. UGI EnergyLink)  
UGI Penn Natural Gas, Inc.  
UGI Utilities, Inc.  
Ultra Resources, Inc.  
United Energy Trading, LLC  
Verde Energy USA Pennsylvania, LLC  
Victory Energy Corporation  
Virginia Power Energy Marketing, Inc.  
Warren Resources, Inc.  
Washington Gas Light Company  
Wells Fargo Commodities, LLC  
WGL Energy Services, Inc.  
WGL Midstream, LLC  
World Fuel Services, Inc.  
Xoom Energy Pennsylvania, LLC.

