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February 21, 2019

VIA ELECTRONIC FILING

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

RE: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division;
Docket No. R-2018-3006814; **PETITION TO INTERVENE OF THE
NATURAL GAS SUPPLIER PARTIES AND THE RETAIL ENERGY
SUPPLY ASSOCIATION**

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Petition to Intervene of the Natural Gas Supplier Parties (“NGS Parties”) and The Retail Energy Supply Association (“RESA”) in the above-captioned docket. Copies of the Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
*Counsel for Natural Gas Supplier Parties
and The Retail Energy Supply Association*

TSS/jld

Enclosure

cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

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DATED: February 21, 2019



Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3006814
	:	
UGI Utilities, Inc – Gas Division	:	

**PETITION TO INTERVENE
OF THE NATURAL GAS SUPPLIER PARTIES
AND THE RETAIL ENERGY SUPPLY ASSOCIATION**

NOW COME the Natural Gas Supplier Parties (“NGS Parties”)¹ and The Retail Energy Supply Association, (“RESA”)²(collectively “NGS/RESA”) by and through counsel, Hawke McKeon & Sniscak, LLP, and hereby petition to intervene in the above-captioned request of UGI Utilities, Inc. – Gas Division (“UGI”), to increase rates by approximately \$71.1 million and to implement extensive and far-reaching tariff modifications. NGS/RESA have many concerns regarding the proposed operational changes and the rate impacts of these proposals.

¹ For purposes of this proceeding, the NGS Parties include Dominion Energy Solutions, Inc. (“DES”) and Shipley Choice LLC d/b/a Shipley Energy (“Shipley”).

² The viewpoints expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

1. On or about January 28, 2019, UGI filed its request to increase rates. NGS/RESA have previously participated in UGI proceedings before this Commission and possess the requisite standing to participate in this proceeding as discussed below.

2. RESA is a trade association of more than 19 competitive suppliers of energy, and has standing as an association, to represent the collective interest of its members in proceedings that address such issues; and, such participation is otherwise in the public interest. 52 Pa. Code § 5.41, *et seq.* RESA's unique interest cannot adequately be represented by any other party. As discussed below, there are several competitive market concerns at issue in this proceeding, with the potential for more to be realized as discovery proceeds.

3. The NGS Parties are an ad hoc group of NGSs that currently serve customers in the UGI service territory.

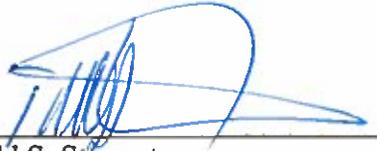
4. As NGSs that serve customers in the UGI service territory, NGS/RESA are concerned with the proposal to implement vast and far-reaching changes to the manner in which suppliers operating on the UGI system are required to deliver gas to customers. While the proposed changes initially were discussed in a collaborative process that was required by a settlement in a prior case, the changes proposed in this case are by no means a consensus view and should not be considered as such. In particular, some of the changes will have undeniable, immediate and substantial financial consequences for the NGS/RESA. NGS/RESA intervention is intended to ensure that any tariff changes that are adopted in this proceeding are in the public interest and not merely intended solely to benefit UGI and/or its affiliated suppliers.

5. NGS/RESA's participation will further the public interest by providing a voice for the natural gas suppliers that participate in the UGI service territory. NGS/RESA's intervention in this proceeding satisfies the requirements of 52 Pa. Code § 52.72(a) in that it has "[a]n interest

which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding”; and, because it will promote the public interest.

Accordingly, NGS/RESA request that their intervention in this proceeding be granted and that they be afforded full party status.

Respectfully submitted,



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DATED: February 21, 2019

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