



ATTORNEYS AT LAW

Todd S. Stewart  
Office: 717-236-1300  
Direct: 717 703-0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

November 4, 2019

**VIA ELECTRONIC FILING**

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

RE: Docket No. A-125051; **REQUEST OF INTERSTATE GAS SUPPLY, INC.  
D/B/A IGS ENERGY TO AMEND ITS NATURAL GAS SUPPLIER  
LICENSE**

Dear Secretary Chiavetta:

Interstate Gas Supply, Inc., d/b/a IGS Energy ("IGS") is a licensed Natural Gas Supplier ("NGS") in the service territories of Columbia Gas of Pennsylvania, PECO, the three Peoples Natural Gas Company entities including TW Peoples and Equitable, NFG, and UGI Utilities Inc. – gas Division. The purpose of this letter is to request that IGS' NGS license be amended to address the recent merger of the three previously separate UGI service territories, and to include the new combined service territory of the now-united UGI Utilities, Inc-Gas Division. We understand that the Commission is requiring NGSs to amend their licenses to incorporate the combined UGI corporate unit.

By way of background, on November 11, 1999, IGS filed an Application to Offer, Render, Furnish or Supply Natural Gas Supply Services as a Natural Gas Supplier ("NGS") in the Commonwealth of Pennsylvania. On January 12, 2000, the Commission approved IGS's license at Docket No. A-125051 and authorized IGS to begin, offer, render, furnish or supply natural gas supply services to all customers within the service territory of Columbia Gas of Pennsylvania, Inc. More recently, on March 11, 2010, the Commission approved by Order the request to modify IGS's license to include the additional service territory of National Fuel Gas Distribution Corporation ("NFG"). On August 31, 2010, IGS filed an Application to amend its NGS License to include the service territory of Peoples Natural Gas Company, LLC ("Peoples") within the Commonwealth of Pennsylvania as well. By Order entered July 14, 2011, the Commission granted the request to add Peoples service territory. Finally, in March of 2016, UGI filed to amend its license to include the former Equitable Gas Company and UGI Utilities Inc., Gas Division. Likewise, these amendments were granted by the Commission.

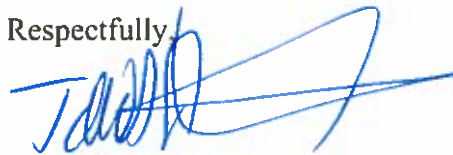
Rosemary Chiavetta, Secretary  
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IGS has contacted UGI with regard to the need for revised financial security as evidenced by the attached letter and UGI has made it clear that additional security is not needed at present but that IGS must change the beneficiary which it is doing presently. Otherwise, there has been no change to any material fact as included in IGS' initial application, other than what might previously been provided to the Commission.

IGS requests that the Commission treat this letter as a request to amend its Natural Gas Supplier License to serve throughout the entire merged UGI Utilities Inc.-Gas Division service territory.

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

Respectfully



Todd S. Stewart  
*Counsel for Interstate Gas Supply, Inc.  
d/b/a IGS Energy*

TSS/jld

Enclosures

cc: Per Certificate of Service  
Tony Cusati  
Jeff McCracken, Bureau of Technical Utility Services

# **EXHIBIT A**



UGI Utilities, Inc.  
1 UGI Drive  
Denver, PA 17517

610-796-3400

VIA E-MAIL

November 4, 2019

Hawke McKeon & Sniscak, LLP  
100 North 10<sup>th</sup> Street  
Harrisburg, PA 17101

**ATTENTION: Todd S. Stewart**

**RE: Interstate Gas Supply, Inc.  
UGI Financial Security Requirements**

Dear Mr. Stewart,

A review of Interstate Gas Supply's ("IGS") existing security indicates that IGS's current level of security is sufficient to cover UGI's merged service territories.

Please amend the current Bond No. 30008839 naming "UGI Utilities, Inc.-Gas Division" as the beneficiary. The amended Bond can be forwarded to:

UGI Utilities, Inc.  
Attn: Ronda Sekela  
1 UGI Drive  
Denver, PA 17517

Please feel free to contact me with any additional questions you may have. I can be reached at [dlahoff@ugi.com](mailto:dlahoff@ugi.com).

Sincerely,

David E. Lahoff  
Senior Manager  
Tariff & Supplier Administration

## CERTIFICATE OF SERVICE

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

### VIA FIRST CLASS MAIL:

Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2 West  
Harrisburg, PA 17120

Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17120

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101-1303

Office of Attorney General  
Bureau of Consumer Protection  
Strawberry Square, 14<sup>th</sup> Floor  
Harrisburg, PA 17120

Commonwealth of Pennsylvania  
Department of Revenue  
Bureau of Compliance  
Harrisburg, PA 17128-0946

Michelle Caddell  
Columbia Gas of Pennsylvania  
290 W. Nationwide Blvd.  
Columbus, OH 43215

David D. Wolford  
National Fuel Gas Distribution Corp.  
6363 Main Street  
Williamsville, NY 14221

Lynda Petrichevich  
Peoples Natural Gas – Equitable Division  
225 North Shore Drive  
Pittsburgh, PA 15212

Lynda Petrichevich  
The Peoples Natural Gas Company  
225 North Shore Drive  
Pittsburgh, PA 15212

Lynda Petrichevich  
Peoples TWP LLC  
225 North Shore Drive  
Pittsburgh, PA 15212

David Lahoff  
UGI Central Penn  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

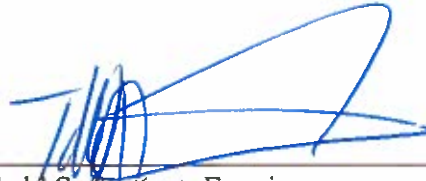
David Lahoff  
UGI  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

David Lahoff  
UGI Penn Natural  
2525 N. 12<sup>th</sup> Street, Suite 360  
Reading, PA 19612-2677

Robert Crocker  
Valley Energy Inc.  
523 South Keystone Avenue  
Sayre, PA 18840-0340

Carlos Thillet, Manager  
Gas Supply and Transportation  
PECO  
2301 Market Street, S9-2  
Philadelphia, PA 19103

Nicholas LaPergola  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122

A handwritten signature in blue ink, appearing to be 'Todd S. Stewart', written over a horizontal line.

Todd S. Stewart, Esquire

DATED: November 4, 2019