



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

January 23, 2024

Docket No. G-2023-3045143
Utility Code: 111100

MICHAEL S SWERLING
UGI CORPORATION
500 NORTH GULPH ROAD
KING OF PRUSSIA, PA 19406-2807
swerlingm@oneugi.com

RE: Affiliated Interest Agreement between UGI Utilities, Inc. and Mountaineer Gas Company, UGI Energy Services, LLC, and AmeriGas Propane, Inc.

Dear Mr. Swerling:

On December 22, 2024, UGI Utilities, Inc. (UGI Utilities) and Mountaineer Gas Company, UGI Energy Services, LLC, and AmeriGas Propane, Inc. (collectively UGI Affiliates) Affiliated Interest Agreement was accepted for filing and docketed with the Public Utility Commission. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached question(s).

Please forward the requested information to the Secretary of the Commission **within 10 days** from the date of this letter. Failure to respond may result in the application being denied. As well, if UGI Utilities or UGI Affiliates has decided to withdraw its Affiliated Interest Agreement, please reply notifying the Commission of such a decision. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

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

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth 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).

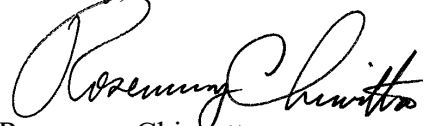
Signature _____

Title _____

Date _____

In addition, to expedite completion of the application, please send a copy of your response to Jordan Van Order at jvanorder@pa.gov. If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, please contact Jordan Van Order of the Bureau of Technical Utility Services via e-mail at jvanorder@pa.gov (preferred) or (717) 787-8763.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure

Docket No. G-2023-3045143
UGI Utilities, Inc.
Data Requests

- TUS-1 Reference the Cover Letter, Section II. Please provide a detailed explanation of the changes between the 1992 Agreement and the proposed Agreement.
- TUS -2 Reference the Cover Letter, Section IV. Please explain all revenue and ratemaking implications the Agreement may have.
- TUS -3 Reference the Cover Letter, Section IV. Please provide a detailed explanation as to why this Agreement is in the best interest of the UGI Utilities, Inc. ratepayers.
- TUS-4 Reference the Agreement, Page 1. Please provide a copy of the Agreement which includes all of the UGI subsidiaries which are party to the Agreement.
- TUS-5 Reference the Agreement, Page 1. Please explain whether the services will be billed at market cost or lower. If so, please revise the Agreement to state such.
- TUS -6 Reference the Agreement, Exhibit A. Please provide a list of rates UGI Utilities, Inc. would have to pay for the services listed in the Agreement if a non-affiliated company provided these services.
- TUS -7 Reference the Agreement, Exhibit A. Please provide the estimated total annual amount UGI Utilities, Inc. will pay its Affiliates for the services provided per the Agreement. Additionally, please state the dollar amount already paid by UGI Utilities, Inc. to its Affiliates.
- TUS-8 Reference the Agreement, Exhibit B. Please explain whether the Affiliated Interest Agreement is based on a competitive analysis. If not, please explain why. If so, please describe the alternatives to UGI Affiliates that were considered. Additionally, please describe the criteria that were used in conducting the comparison and explain why UGI Affiliates specifically were selected.
- TUS -9 Reference the Agreement, Exhibit B. Please provide a calculation of the profit margin the Affiliates will charge for services, provided to UGI Utilities, Inc. If no profit margin will be charged, provide a complete explanation as to why.