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June 25, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Fl
400 North Street
Harrisburg, PA 17120

**Re: Petition of UGI Utilities, Inc. – Electric Division For Approval of a Default Service Plan (DSP V) for the Period of June 1, 2025 through May 31, 2029
Docket Nos. P-2024-3049343, et al.**

Dear Secretary Chiavetta:

Attached for filing please find the Prehearing Memorandum on behalf of UGI Utilities, Inc. – Electric Division in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/kl
Attachment

cc: The Honorable Dennis J. Buckley (*via email; w/attachment*)
The Honorable Alphonso Arnold III (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

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

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Date: June 25, 2024



Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Utilities, Inc. – Electric :
Division For Approval of a Default : Docket Nos. P-2024-3049343
Service Plan (DSP V) for the Period of : G-2024-3049351
June 1, 2025 through May 31, 2029 :

**PREHEARING CONFERENCE MEMORANDUM OF
UGI UTILITIES, INC. – ELECTRIC DIVISION**

**TO ADMINISTRATIVE LAW JUDGES DENNIS J. BUCKLEY AND ALPHONSO
ARNOLD III:**

I. INTRODUCTION AND BACKGROUND

UGI Utilities, Inc. – Electric Division (“UGI Electric” or “Company”) hereby submits this Prehearing Conference Memorandum in compliance with the Prehearing Conference Order issued by Administrative Law Judges Dennis J. Buckley and Alphonso Arnold III (the “ALJs”) on June 13, 2024, for the above-captioned proceeding.

On May 31, 2024, UGI Electric filed the above-captioned petition with the Pennsylvania Public Utility Commission (“Commission”) requesting approval for a Default Service Plan for the period of June 1, 2025 through May 31, 2029 (“DSP V,” “Default Service Plan,” or “Plan”).

In the Default Service Plan, UGI Electric proposes to: (1) procure a competitive mix of default service supplies through load-following, block and spot market purchases, and related Alternative Energy Portfolio Standards (“AEPS”) credits over the 4-year DSP V Term (i.e., 2025-2029); (2) implement a procurement schedule designed to obtain these supplies at the least cost; (3) issue Requests for Proposals (“RFPs”) seeking default supply in accordance with the agreements and forms included with this Petition; (4) adopt a contingency plan that addresses any procurement target shortfalls; (5) recover all incurred default service costs on a full and current basis through a specified default service rate design; (6) adopt revised tariff rules clarifying the

application of GSR-1 and GSR-2 default service rate classifications; and (7) continue the retail enhancement programs adopted in DSP IV.

On June 5, 2024, the Commission issued an Initial Call-In Telephone Hearing Notice, scheduling a Prehearing Conference in this proceeding for Friday, June 28, 2024, at 10:00 a.m. before the ALJs.

On June 11, 2024, the Commission issued a Notice to Be Published, dictating that Formal Protests, Petitions to Intervene, and Answers must be filed in accordance with Title 52 of the Pennsylvania Code on or before July 12, 2024.

On June 13, 2024, the ALJs issued a Prehearing Order directing, among other things, the submission of Prehearing Conference Memorandums on or before June 25, 2024.

Also on June 13, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

On June 18, 2024, Penn Renewables LLC (“Penn Renewables”) filed a Formal Complaint.

On June 21, 2024, the Office of Consumer Advocate (“OCA”) filed an Answer.

II. SERVICE OF DOCUMENTS

Counsel for UGI Electric is authorized to receive service of all documents in this matter.

Counsel for UGI Electric, together with their contact information, is listed below.

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Counsel for UGI Electric request to be served via electronic communication where practicable.

III. WITNESSES AND ISSUES

UGI Electric interprets the issues in this proceeding to be those addressed in the direct testimony and exhibits filed with its Default Service Plan. The list below delineates the witnesses to testify in this proceeding and their respective subject matters:

Witness	Subject Matter
Jesse R. Tyahla Director – Energy Supply and Planning UGI Utilities, Inc. 1 UGI Drive Denver, PA 17517	Mr. Tyahla describes the Company’s current DSP period, details the Company’s activities undertaken in compliance with its prior settlement obligations, describes the proposed DSP V period, and describes the Company’s plan to seek an auction manager for its proposed DSP V period.
James M. Rouland Managing Consultant and Practice Area Lead Daymark Energy Advisors 370 Main Street, Suite 325 Worcester, MA 01608	Mr. Rouland describes how the proposed DSP V will acquire electric generation supply at the least cost to the Company’s customers, utilize a prudent mix of resources, and use a competitive bid solicitation process.
Tracy Hazenstab Principal Analyst, Rates UGI Utilities, Inc. 1 UGI Drive Denver, PA 17517	Ms. Hazenstab addresses the rate design and Section 1307(e) cost recovery mechanisms in place for DSP IV and that will continue in the DSP V term, as well as certain tariff updates clarifying the applicability of UGI Electric’s Generation Supply Rate and Price to Compare,

as well as additional tariff modifications and retail enhancement programs proposed as part of DSP V.

The subject matters listed above, as further supported by the testimony and exhibits, represent UGI Electric’s statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding. UGI Electric reserves the right to call additional witnesses to present testimony on additional issues and subject matters that may arise during the course of this proceeding.

IV. PROCEDURAL SCHEDULE

UGI Electric proposes the following schedule:

Non-Company Parties’ Direct Testimony	August 2, 2024
Rebuttal Testimony	August 30, 2024
Surrebuttal Testimony	September 25, 2024
Evidentiary Hearings (including oral rejoinder)	September 30 – October 1, 2024
Main Briefs	October 15, 2024
Reply Briefs	October 25, 2024

UGI Electric has been in communication with the parties in an effort to develop a mutually agreeable schedule. As of the filing of this Prehearing Memorandum, UGI Electric understands that the OCA is in agreement with the schedule proposed above.

V. DISCOVERY

UGI Electric does not propose any modification to the Commission’s procedural rules regarding discovery for the remainder of the proceeding but will consider any modifications proposed by other parties.

UGI Electric has been engaged in discovery in this proceeding and is not aware of any discovery issues to date.

VI. PROTECTION OF CONFIDENTIAL INFORMATION

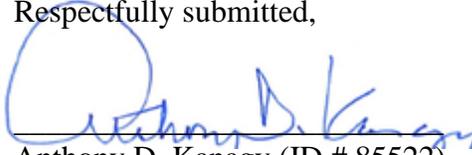
UGI Electric intends to timely submit an appropriate Motion for Protective Order. UGI Electric intends to collaborate with the parties in an effort to develop the proposed Protective Order.

VII. SETTLEMENT

Though there have not yet been any formal settlement discussions, UGI Electric is willing to enter settlement discussions with all parties on all issues in this proceeding.

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Respectfully submitted,



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Date: June 25, 2024