



COMMONWEALTH OF PENNSYLVANIA

August 14, 2024

**E-FILED**

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

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division /  
Docket No. R-2024-3048828**

Dear Secretary Chiavetta:

The Office of Small Business Advocate (“OSBA”) submits this letter to inform the Public Utility Commission that it does not oppose the *Joint Petition for Settlement of Section 1307(f) Rate Investigation* filed by the parties in the above-captioned proceeding. The OSBA filed a Complaint in this proceeding on June 10, 2024.

As set forth in the OSBA’s June 13, 2024, prehearing memo, the OSBA reviewed the following issues set forth in the annual Purchased Gas Cost (“PGC”) Rate filing of UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”): the Company’s lost and unaccounted-for gas rates; the Company’s design day demand forecasting and peak day capacity requirements; the Company’s gas price hedging strategy; the Company’s gas supply mix and strategy for basin diversification; and the Company’s strategy for capacity release, off-system sales, asset management arrangements, and storage fill agreements.

The OSBA also engaged in settlement discussions with UGI Gas and the other parties. The OSBA did not identify any aspects of the issues set forth above that were unjust or unreasonable to small business customers. Therefore, this letter serves as formal notice that the OSBA does not oppose the *Joint Petition for Settlement of Section 1307(f) Rate Investigation* filed by the other parties.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Emma Grazier / Mark Ewen  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket No. R-2024-3048828</b>
	:	
<b>UGI Utilities, Inc. – Gas Division</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Dennis J. Buckley  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
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Commonwealth Keystone Building  
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[debuckley@pa.gov](mailto:debuckley@pa.gov)

The Honorable Alphonso Arnold III  
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Pennsylvania Public Utility Commission  
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DATE: August 14, 2024

*/s/ Steven C. Gray* \_\_\_\_\_  
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