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File #: 205959

October 8, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
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 (DSPV) For The Period Of June 1, 2024 Through May 31, 2029
Docket No. P-2024-3049343

Dear Secretary Chiavetta:

Attached for filing is the Motion to Admit on the Record Data Request on behalf of UGI Utilities, Inc. – Electric Division. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Attachment

cc: The Honorable Dennis 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).

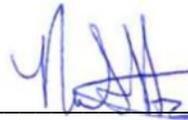
VIA E-MAIL

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Date: October 8, 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 :

MOTION TO ADMIT ON THE RECORD DATA REQUEST

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

UGI Utilities, Inc. – Electric Division (“UGI Electric” or the “Company”) hereby moves to admit an on the record data request made by Penn Renewables LLC (“Penn Renewables”) during the Evidentiary Hearing in the above-captioned matter on October 1, 2024, pursuant to 52 Pa. Code § 5.103; 52 Pa. Code § 5.351.

In support of this Motion, the Companies state as follows:

I. BACKGROUND

1. UGI Utilities, Inc. (“UGI Utilities”) is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and a wholly owned subsidiary of UGI Corporation.

2. UGI Utilities has two divisions – the Gas Division (UGI Gas) and the Electric Division (UGI Electric).

3. UGI Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2803.

4. UGI Electric primarily provides electric distribution services to approximately 62,000 customers in Luzerne and Wyoming counties in Northeastern Pennsylvania.

5. 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”).

6. 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.

7. 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.

8. 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.

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

10. On June 18, 2024, Penn Renewables filed a Formal Complaint.

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

12. On September 25, 2024, Counsel for UGI Electric contacted Administrative Law Judges Dennis J. Buckley and Alphonso Arnold III (collectively, the “ALJs”) and requested that the first day of scheduled Evidentiary Hearings on September 30, 2024, be cancelled.

13. Later on September 25, 2024, the ALJs cancelled the September 30, 2024 Evidentiary Hearing.

14. On October 1, 2024, UGI Electric served its written rejoinder testimony on the ALJs and parties.

15. Later on October 1, 2024, the Evidentiary Hearing convened as scheduled. During cross-examination of one of the Company's witnesses, Penn Renewables made an on the record data request, requesting that UGI Electric provide an updated discovery response for Penn Renewables discovery question Set III, No. 8 to UGI Electric. The Company agreed to do so within one-week pursuant to the ALJs' request.

II. MOTION TO RESPOND TO RECORD DATA REQUEST

16. In consideration of the above, UGI Electric has attached its response to the on the record data request to this Motion as **Appendix A**. The response has been labelled as "UGI Electric Updated Response to Penn Renewables Set III, Question 8."

17. UGI Electric hereby respectfully moves to admit "UGI Electric Updated Response to Penn Renewables Set III, Question 8" into the record in this proceeding.

18. UGI Electric submits that this request is consistent with the procedure(s) outlined in 52 Pa. Code § 5.351.

19. In addition to providing a hard copy of the response as **Appendix A** hereto, UGI Electric will provide the ALJs and parties with a live Microsoft Excel version of the response via electronic mail.

III. CONCLUSION

WHEREFORE, UGI Utilities, Inc. – Electric Division respectfully requests that Administrative Law Judges Dennis J. Buckley and Alphonso Arnold III accept this Motion and associated **Appendix A** as its response to the October 1, 2024, record data request and admit “UGI Electric Updated Response to Penn Renewables Set III, Question 8” into the record in this proceeding.

Respectfully submitted,



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Dated: October 8, 2024

Counsel for UGI Utilities, Inc. – Electric Division

Appendix A

UGI Electric Updated Response to Penn Renewables Set III, Question 8

UGI Utilities, Inc. - Electric Division
Docket No. P-2024-3049343
UGI Electric Default Service Plan
Responses to Penn Renewables Set III (1-31)
Delivered on July 29, 2024

Question 8

Request:

Please add columns on Attachment Penn I-2

- a. to include an example for a comparable non-generating GSR-2 customer of similar 1,000 kW load;
- b. that demonstrates the PTC if the customer generator, assuming all other factors remain the same, is producing at 100 kw in a given hour; and
- c. that demonstrates the PTC if the customer generator is producing at 200 kw in a given hour.

Response:

Please see REVISED Attachment PENN-III-8.

Prepared by or under the supervision of: Tracy A. Hazenstab

UGI UTILITIES, INC. – ELECTRIC DIVISION
GSR-2 CUSTOMER PRICE TO COMPARE EXAMPLE CALCULATION

Line #	Line Item Description for GSR-2 Customer	Example of Hour Net Consumption (kWh)	Example of Hour Net Generation (kWh) /C	Example of Hour Consumption (kWh) Non-Customer Generator	Example of Hour Net Generation (kWh) /C	Example of Hour Net Generation (kWh) /C
1	kWh (metered value)	100	(1,000)	1,000	(100)	(200)
2	Applicable hourly EHV Loss percentage (from PJM)	0.6%	0.6%	0.6%	0.6%	0.6%
3	Total loss percentage with inclusion of 6.5% UGI system loss (L2+6.5%)	7.1%	7.1%	7.1%	7.1%	7.1%
4	Loss gross up factor (1-L3)	92.9%	92.9%	92.9%	92.9%	92.9%
5	Grossed up kWh for losses (L1/L4)	108	(1,076)	1,076	(108)	(215)
6	Applicable hourly deration factor (from PJM)	3.9%	3.9%	3.9%	3.9%	3.9%
7	Deration factor (1-L6)	96.1%	96.1%	96.1%	96.1%	96.1%
8	kWh (with deration) (L5*L7)	103	(1,034)	1,034	(103)	(207)
9	LMP (\$/MWh)	\$ 40.0000	\$ 40.0000	\$ 40.0000	\$ 40.0000	\$ 40.0000
10	LMP (\$/kWh) (L9/1000)	\$ 0.0400	\$ 0.0400	\$ 0.0400	\$ 0.0400	\$ 0.0400
11	Total LMP charges (L8*L11)	\$ 4.1378	\$ (41.3778)	\$ 41.3778	\$ (4.1378)	\$ (8.2756)
12	PJM allocated charges - PLC based (\$/kW)	\$ 0.2597	\$ (2.5972)	\$ 2.5972	\$ (0.2597)	\$ (0.5194)
13	PJM allocated charges - NSPL based (\$/kW) /A	\$ 0.6375	\$ (6.3750)	\$ 12.7500	\$ (0.6375)	\$ (1.2750)
14	PJM allocated charges/(credits) - kWh based (\$/kWh)	\$ (0.0076)	\$ (0.0076)	\$ (0.0076)	\$ (0.0076)	\$ (0.0076)
15	Total PJM allocated charges/(credits) - kWh based (L8*L14)	\$ (0.7862)	\$ 7.8618	\$ (7.8618)	\$ 0.7862	\$ 1.5724
16	DSP A&G allocated costs - kWh based (\$/kWh)	\$ 0.0070	\$ 0.0070	\$ 0.0070	\$ 0.0070	\$ 0.0070
17	Total DSP A&G allocated costs - kWh based (L8*L16)	\$ 0.7241	\$ (7.2411)	\$ 7.2411	\$ (0.7241)	\$ (1.4482)
18	Net Metering Purchase Reconciliation /B (charge/(credit)*L8) (\$/kWh)	\$ -	n/a	\$ -	n/a	n/a
19	Total GSR-2 (L11+L12+L13+L15+L17+L18) excluding GRT	\$ 4.9729	\$ (49.7294)	\$ 56.1044	\$ (4.9729)	\$ (9.9459)
20	Total GSR-2 charges including GRT (L19/(1-5.9%))	\$ 5.2847	\$ (52.8474)	\$ 59.6221	\$ (5.2847)	\$ (10.5695)
21	STAS (currently 0%)	\$ 0.00%	\$ 0.00%	\$ 0.00%	\$ 0.00%	\$ 0.00%
22	Total PTC-2 (L20*(1+L21))	\$ 5.2847	\$ (52.8474)	\$ 59.6221	\$ (5.2847)	\$ (10.5695)
23	Unit PTC-2 (per kWh) (L22/L8)	\$ 0.0511	\$ 0.0511	\$ 0.0576	\$ 0.0511	\$ 0.0511

Assumed \$40/MWh for example

1.87 May 2024 avg \$/kW value of \$1.87
9.18 May 2024 avg \$/kW value of \$9.18
May 2024 avg \$/kWh value

May 2024 avg \$/kWh value

/A - Assumes NSPL value of 50kW (net consumption on 50% of NSPL hours) for all scenarios except for customer with usage of 1,000 kWh which utilizes an NSPL value of 100kW (indicative of 100kW load during all NSPL hours).

/B - Assumes no current reconciliation charges/(credits)

/C - Values shown in Line 1 for generating customers are representative of net production over an hourly period

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

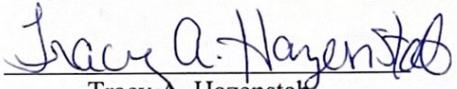
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VERIFICATION

I, Tracy A. Hazenstab, being Principal Analyst, Rates, for UGI Utilities, Inc., hereby state that the information set forth in UGI Utilities, Inc. – Electric Division’s Updated Response to Penn Renewables Set III, Question No. 8, is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answer(s) would be as set forth therein. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

October 8, 2024

Date


Tracy A. Hazenstab