



COMMONWEALTH OF PENNSYLVANIA

February 7, 2025

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-2024-3052716**

Dear Secretary Chiavetta:

Enclosed please find the Complaint, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, 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: Kevin Higgins
Parties of Record

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of Supplement No. 55 to UGI Gas Tariff Pa. P.U.C. Nos. 7 and 7S (“Supplement No. 55”), which was filed with the Commission on January 27, 2025, by UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”).

6. Supplement No. 55 proposes to increase UGI Gas’s annual jurisdictional revenues by \$110.395 million, or by 9.7%.

7. Supplement No. 55 proposes that an “average” commercial heating customer, using 28.3 Mcf per month, would see their monthly bill increase from \$305.44 to \$331.80, or by 8.6%.

8. Supplement No. 55 proposes that UGI Gas should receive a Return on Equity (“ROE”) of 11.0%. In addition, Supplement No. 55 also proposes that UGI Gas should be awarded an additional 0.20% due to “exemplary management performance.”

9. After preliminary review of the materials filed by the Company in support of the proposed Supplement No. 55, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

10. Complainant believes, and therefore avers, that UGI Gas's proposed tariff changes and proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by UGI Gas.

11. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 55;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 55 to the extent required to make certain that UGI Gas's rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Steven C. Gray

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

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: February 7, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3052716
	:	
UGI Utilities, Inc. – Gas Division	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed base rate tariff filings of UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”).

The Small Business Advocate files this formal complaint against the Company’s proposed rate filing to protect the interests of the UGI Gas’s small business customers. UGI Gas’s rate filing proposes to increase the Company’s annual jurisdictional revenues by \$110.395 million, or by 9.7%. The Company’s rate filing also proposes that an “average” commercial heating customer, using 28.3 Mcf per month, would see their monthly bill increase from \$305.44

to \$331.80, or by 8.6%. In addition, the Company's rate filing proposes that UGI Gas should receive a Return on Equity ("ROE") of 11.0%, as well as an additional 0.20% due to "exemplary management performance." Consequently, a thorough inquiry by the Commission into all elements of the Company's proposed base rate tariff filings is necessary to ensure that the tariff filings are lawful, just, reasonable, and not discriminatory to UGI Gas's small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed base rate tariff filings. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by UGI Gas to be lawful, just, reasonable, and not discriminatory to the Company's small business customers.

Dated: February 7, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above 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).

Date: February 7, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
: **Docket No. R-2024-3052716**
v. :
: **UGI Utilities, Inc. – Gas Division** :
:

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 Charles E. Rainey, Jr.
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Date: February 7, 2025

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