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February 18, 2025

**VIA ELECTRONIC FILING**

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; **PETITION TO INTERVENE OF THE RETAIL  
ENERGY SUPPLY ASSOCIATION AND SHIPLEY CHOICE, LLC D/B/A  
SHIPLEY ENERGY**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of The Retail Energy Supply Association and Shipley Choice, LLC d/b/a Shipley Energy (“RESA/Shipley”) in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "TSS", is written over a large, stylized blue scribble.

Todd S. Stewart  
*Counsel for The Retail Energy Supply  
Association and Shipley Choice, LLC d/b/a  
Shipley Energy (“RESA/Shipley”)*

TSS/jld

Enclosure

cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

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Todd S. Stewart

DATED: February 18, 2025



1. On or about January 27, 2025, UGI filed with the Commission a request to increase base rates by \$ 110,395,000, or 9.7%. At its February 20, 2025, Public Meeting, the Commission is expected to act on UGI's request and is almost certain to suspend UGI's requested changes for the maximum statutory time limit.

2. RESA/Shipley are represented in the above-captioned matter by the following counsel:

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Attorney I.D. No. 75556  
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3. Shipley currently serves customers across the full spectrum of customer classes on the UGI system, including residential, commercial, and industrial customers. As such, Shipley has a direct and immediate interest in any modifications to any tariff, rule changes or the like, which could impact their ability to serve those customers and they have a clear interest in any tariff provisions, whether new or existing, that directly have impacted or will impact their ability to reasonably and fairly serve customers on the UGI system. As a trade association that represents the interests of competitive suppliers, RESA likewise has standing to participate in this matter.

4. RESA/Shipley have a common concern about the way that UGI communicates with suppliers. This concern includes communications regarding deadlines, and confirmations. The timeliness of communications also is a problem as is the case with Communication regarding critical days. In some recent incidents, UGI curtailed supply to NGS customers without so much as a single message notifying the suppliers of the action. There are other examples of lax or lack of communications. RESA/Shipley also have concerns about operational requirements including

penalties and application of UGI's zero-tolerance policy. Ultimately, the lack of solid communication can lead to fees charged and/or service provided by UGI.

5. The Commission's regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having an "interest which may be directly affected, and which is not adequately represented by existing participants and as to which the petitioner may be bound by the action of the Commission in the proceeding." Shipley has standing to participate in this matter because individually it serves customers on the UGI system, all are charged fees by UGI as a consequence of that service, and they each also receive services from UGI, which means they have an interest that will be directly affected by the outcome of this matter, their interests are not represented nor can they be adequately represented by any other party to this proceeding, and they will be bound by any action of the Commission in this proceeding. Because RESA is a trade association that has participated in innumerable Commission proceedings as a trade association comprised of participants in competitive markets its participation is in the public interest. Accordingly, RESA/Shipley's Petition to Intervene should be granted.

WHEREFORE, RESA/Shiplay respectfully request that the Presiding Administrative Law Judge and Commission grant their Petition to Intervene in the above-captioned matter and provide them will full party status in this proceeding.

Respectfully submitted,



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DATED: February 18, 2025