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December 21, 2012

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

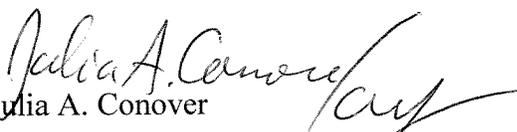
**Re: Petition of Metropolitan Edison Company, Petition of Pennsylvania Electric Company, and
Petition of West Penn Power Company
Docket Nos. M-20212-23343387, M-2012-2334392, and M-2012-2334398**

Dear Secretary Chiavetta:

On December 1, 2012, the Pennsylvania Bulletin published notice of the referenced petitions for approval of three Phase II EE&C Plans which were filed with the Pennsylvania Public Utility Commission on November 15, 2012. See 43 Pa.B. 7372. That notice provided a period of 20 days for parties to submit comments to the proposed plans. UGI Utilities, Inc. – Gas Division (“UGI”), UGI Penn Natural Gas, Inc. (“PNG”) and UGI Central Penn Gas, Inc. (“CPG”) (collectively, the “UGI Distribution Companies”), have intervened in these matters. The UGI Distribution Companies intend to present direct testimony and fully participate in the litigated proceeding in accordance with the schedule set by ALJ Barnes.

Because the notice filed in the Pennsylvania Bulletin requires the filing of comments within 20 days of its publication, UGI Distribution Companies are filing this letter in lieu of comments to inform the Commission of its intent to fully participate in the captioned proceeding through the filing of testimony and briefing.

Very truly yours,


Julia A. Conover

JAC/jld

cc: Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

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 E-MAIL AND FIRST CLASS MAIL

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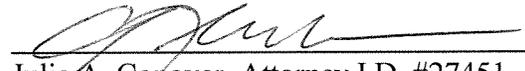
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VIA FIRST CLASS MAIL

Honorable Elizabeth H. Barnes
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Dated: December 21, 2012