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VIA E-FILING

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

**Re: Investigation of Pennsylvania's Retail Electricity Market:
End State of Default Service, Docket No. I-2011-2237952**

Dear Secretary Chiavetta:

In accordance with ordering paragraph numbers 5 and 6 of the Commission's February 15, 2013 Final Order at the above docket, enclosed is the plan of UGI Utilities, Inc. – Electric Division for implementing seamless moves and instant connects in its service territory by June 1, 2015.

Should you have any questions concerning this filing, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark C. Morrow", with a long horizontal flourish extending to the right.

Mark C. Morrow

Counsel for
UGI Utilities, Inc. – Electric Division

Summary Plan for the Implementation of Seamless Moves and Instant Connects - UGI Utilities, Inc. - Electric Division

Overview:

The purpose of this document is to provide an informational response in compliance with the Commission's order directing EDCs to provide a plan for implementing Seamless Moves and Instant Connects by June 1, 2015 as part of the Final Order in the Pennsylvania Public Utility Commission's Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service at Docket I-2011-2237952.

Definitions:

Seamless Move – The ability of a customer's choice of supplier to move with the customer to a new address without interruption.

Instant Connect – The ability of supply service to start on "day one" of new utility service without the customer first having to go on default service.

Background

As a result of the Commission's order regarding the implementation of seamless moves and instant connects, UGI conducted an analysis regarding potential issues and possible approaches with respect to facilitating the handling of these type of service requests within our existing customer information system and EDI platform. Also included in these discussions were reviews of the notes and findings from joint Pennsylvania EDC's meetings regarding the same topic. Some of the key points of consideration as identified by UGI were:

- Possible impacts to existing PJM related scheduling and reconciliation processes
- Handling requests for service prior to the establishment of a new account in the Company's information system
- Treatment of enrollment "cancelations" on pending new accounts
- Notification to Electric Supply when the pending account becomes active
- Existing treatment of Commercial/Industrial service activations
- Automatic acceptance of customer move request by supplier
- Prohibition on backdating of connects
- Consistency with pending 814Move EDI transaction (EDEWG)
- No changes to rate class/rate code/tax exempt status
- Supplier drops of seamless moves consistent with existing rules
- Applicability of rescission process

The Company explored a number of potential methods for implementing both seamless moves and instant connects and has developed a tentative approach that addresses most of the existing points of consideration. Process flowcharts have been developed and documented for both Seamless Moves and Instant Connects and these documents will form the foundation for the upcoming required system changes.

Project Schedule

Based on the preliminary approach that has been developed, the Company estimates that it will take approximately 21 weeks to implement system changes to facilitate seamless moves and instant connects at UGI Electric Division. Any significant changes to the preliminary design could impact this time estimate. Given the current lack of suppliers marketing to residential customers in the UGI Electric service territory, the Company proposes to begin the Seamless Move/Instant Connect project in early 2015 in anticipation that an active residential Choice market will have developed by then. The chart below represents a high level project schedule showing the key phases of Design, Development and Testing for the Seamless Move/Instant Connect project.

Month	Feb-15	Mar-15	Apr-15	May-15	Jun-15
Design					
Development					
Testing					
Training					

Project Costs and Recovery Method

The Company does not have a detailed cost estimate for this project at this time and reserves the right to petition for cost recovery at a later date if the total costs associated with this project are significant in nature.