



July 29, 2014

VIA FEDERAL EXPRESS

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

**Re: Request for Clarification on Notice Requirements for Combined
Electricity and Natural Gas Disclosure Statements; 52 Pa. Code
Sections 54.5, 54.10 and 62.75; Docket No. L-2014-2409385**

Dear Secretary Chiavetta:

Enclosed for filing are the comments of UGI Energy Services, LLC in response to the Commission's Tentative Order dated July 9, 2014, in the above-captioned proceeding

Should you have any questions concerning this filing, please contact me at marklef@ugicorp.com or (610) 768-3625.

Respectfully yours,

A handwritten signature in blue ink that reads "Frank H. Markle".

Frank H. Markle
Senior Counsel
UGI Corporation

Attorney for UGI Energy Services, LLC

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Request for Clarification on Notice :
Requirements for Combined Electricity :
and Natural Gas Disclosure Statements; : Docket No. L-2014-2409385
52 Pa. Code Sections 54.5, 54.10 and :
62.75 :

COMMENTS OF UGI ENERGY SERVICES, LLC

On June 16, 2014, Independence Energy Group LLC d/b/a Energy Rewards (“Energy Rewards”) filed a letter with the Commission’s Secretary and the Commission’s Office of Competitive Market Oversight (OCMO) to request clarification of the contract renewal/expiration notice requirements applicable to electric and natural gas suppliers. In the event that a customer is supplied both electric and natural gas from the same supplier, and the end of the Customer’s contract terms are within 30 days of each other, Energy Rewards is proposing that marketers be permitted to send only two renewal notices to such combined electric/natural gas customers, in order to avoid customer confusion.

On July 9, 2014, the Commission issued a Tentative Order summarizing the recommendation from OCMO to address Energy Rewards’ request and requesting further comment from interested parties. After reviewing the existing notice requirements for both electric and natural gas OCMO’s recommendation is that, in instances where a customer is receiving both electric generation and natural gas supply service from the same competitive supplier and the terms for both services expire within 30 days of each other, it is acceptable to send two contract expiration notices that address both services. The timing of the two notices shall comply with the timeframes found in the natural gas disclosure regulations; 52 Pa. Code §62.75(g)(1) -- one at 90 days and the second at 60 days. However, all other aspects of the electric regulations (52 Pa Code §§ 54.5 and 54.10) must be applied to the customer’s electric generation service, in OCMO’s view.

UGI Energy Services agrees with and offers its full support of OCMO’s recommendation. This approach will provide timely and accurate information to customers in making service renewal decisions, while minimizing the burden on suppliers and avoiding potential customer confusion. UGIES urges the Commission to adopt OCMO’s recommendation.

Respectfully submitted,



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Dated: July 29, 2014