



COMMONWEALTH OF PENNSYLVANIA

April 29, 2015

E-FILED

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

**Re: Petition of UGI Utilities, Inc. - Electric Division for Approval of Phase II of its
Energy Efficiency and Conservation Plan
Docket No. M-2015-2477174**

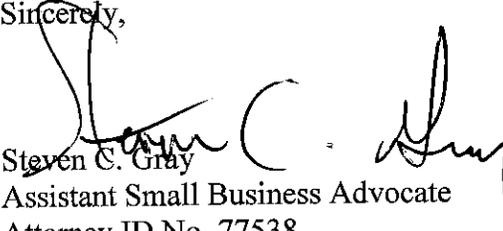
Dear Secretary Chiavetta:

I am delivering for filing today the Notice of Intervention, Public Statement, Answer, and Verification, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

True and correct copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,


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

Enclosures

cc: Hon. Charles E. Rainey, Jr.
Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

v.

**Petition of UGI Utilities, Inc. - Electric Division
For Approval of Phase II of its Energy
Efficiency And Conservation Plan**

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DOCKET NO. M-2015-2477174

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Administrative Law Judge
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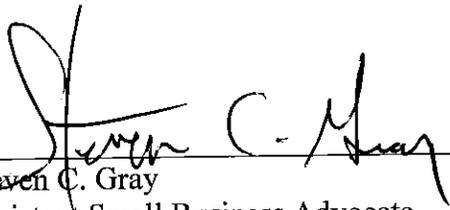
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April 29, 2015



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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
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**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

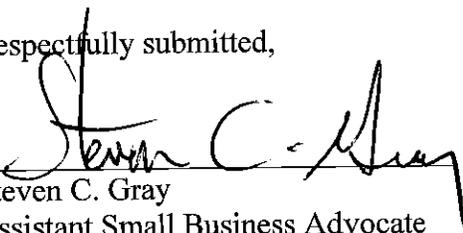
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition of UGI Utilities, Inc. – Electric Division (“UGI” or the “Company”) for Approval of Phase II of its Energy Efficiency and Conversation (“EE&C”) Plan that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 9, 2015.

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

Respectfully submitted,



Steven C. Gray
Assistant Small Business Advocate
Attorney I.D. No. 77538

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525

Date: April 29, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
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v.

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DOCKET NO. M-2015-2477174

**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 (the "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 his 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 an Answer and Notice of Intervention in the above-captioned Commission proceeding.

On April 9, 2015, UGI Utilities, Inc. – Electric Division ("UGI" or the "Company") filed with the Commission a petition for approval of Phase II of the Company's Energy Efficiency and Conservation ("EE&C") Plan.

The Small Business Advocate is intervening in this proceeding in order to protect the interests of the Company's small business customers. A thorough inquiry by the Commission into all of the elements of the petition is necessary to ascertain whether UGI's proposal for a Phase II EE&C Plan is just and reasonable.

In view of the foregoing, the Small Business Advocate is requesting that the petition be subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify the Company's petition if it is not proven by UGI to be in accordance with the Public Utility Code and with the Commission's regulations.

Dated: April 29, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
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**ANSWER OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

Pursuant to 52 Pa. Code § 5.61 (relating to answers to petitions), the Office of Small Business Advocate (“OSBA”) submits this Answer to the Petition of UGI Utilities, Inc. – Electric Division (“UGI” or the “Company”) for Approval of Phase II of its Energy Efficiency and Conservation (“EE&C”) Plan (“*Petition*”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 9, 2015.

Responses to the *Petition*’s Numbered Paragraphs

Introduction

1. The averments of Paragraph 1 contain conclusions of law to which no response is required. By way of further response, 66 Pa. C.S. §§ 102 and 2803 speak for themselves. The remaining averments of Paragraph 1 are denied, as the OSBA has no first-hand knowledge of those facts.

2. The averments of Paragraph 2 contain conclusions of law to which no response is required. By way of further response, Act 129, the December 23, 2009, Secretarial Letter cited by the Company in Paragraph 2, and 66 Pa. C.S. § 2806 speak for themselves.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Admitted.

Applicable Standards

8. The averments of Paragraph 8 contain conclusions of law to which no response is required. By way of further response, the Secretarial Letter cited by the Company in Paragraph 8 speaks for itself.

9. The averments of Paragraph 9 contain conclusions of law to which no response is required. By way of further response, the various Commission Orders cited by the Company in Paragraph 9 speak for themselves. The remaining averments of Paragraph 9 are denied, and strict proof thereof is demanded.

10. The averments of Paragraph 10 contain conclusions of law to which no response is required. By way of further response, any Commission pronouncements on the issues set forth in Paragraph 10 speak for themselves.

Overview of UGI Electric's EE&C Plan

11. The averments of Paragraph 11 contain summaries of UGI's request for relief to which no response is required. By way of further response, the OSBA admits that the Company included a multi-page page document titled "UGI Electric Exhibit 1" with the *Petition*. To the

extent a response is required, the averments regarding “Exhibit 1” are denied, and strict proof thereof is demanded.

12. The averments of Paragraph 12 contain summaries of UGI’s request for relief to which no response is required. By way of further response, the Commission Order cited by the Company in Paragraph 12 speaks for itself.

13. The averments of Paragraph 13 contain summaries of UGI’s request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 13 are denied, and strict proof thereof is demanded.

14. Denied. By way of further response, the OSBA has no first-hand knowledge of UGI’s intent to file testimony.

15. The averments of Paragraph 15 contain summaries of UGI’s request for relief to which no response is required. By way of further response, the OSBA admits that the Company included a multi-page page document titled “UGI Electric Exhibit 2” with the *Petition*. To the extent a response is required, the averments regarding “Exhibit 2” are denied, and strict proof thereof is demanded.

EE&C Plan Development Process

16. The averments of Paragraph 16 contain summaries of UGI’s request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 16 are denied, and strict proof thereof is demanded.

17. The averments of Paragraph 17 contain summaries of UGI’s request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 17 are denied, and strict proof thereof is demanded.

18. Denied, as the OSBA has no first-hand knowledge of the averments contained in Paragraph 18.

Description of the EE&C Plan

19. The averments of Paragraph 19 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 19 are denied, and strict proof thereof is demanded.

20. The averments of Paragraph 20 contain summaries of UGI's request for relief or self-congratulatory statements by the Company to which no response is required. To the extent a response is required, the averments of Paragraph 20 are denied, and strict proof thereof is demanded.

21. The averments of Paragraph 21 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 21 are denied, and strict proof thereof is demanded.

22. The averments of Paragraph 22 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 22 are denied, and strict proof thereof is demanded.

23. The averments of Paragraph 23 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 23 are denied, and strict proof thereof is demanded.

24. The averments of Paragraph 24 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 24 are denied, and strict proof thereof is demanded.

Implementation Strategy

25. The averments of Paragraph 25 contain summaries of UGI's request for relief to which no response is required. To the extent a response is required, the averments of Paragraph 25 are denied, and strict proof thereof is demanded.

Public Interest Determination and Request for Relief

26. The averments of Paragraph 26 contain conclusion of law or requests for relief to which no response is required. To the extent a response is required, the averments of Paragraph 26 are denied, and strict proof thereof is demanded.

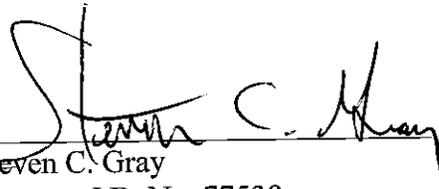
27. The averments of Paragraph 27 are requests for relief to which no response is required.

Conclusion

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

- A. Direct the Office of Administrative Law Judge to hold hearings on the *Petition* and prepare an initial decision; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,



Steven C. Gray
Attorney I.D. No. 77538
Assistant Small Business Advocate

For:
John R. Evans
Small Business Advocate

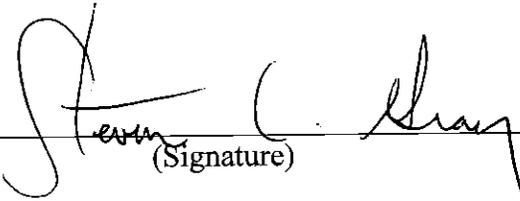
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831

Dated: April 29, 2015

VERIFICATION

I, Steven C. Gray, Esquire, 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: April 29, 2015


(Signature)