

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 20, 2016

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:

Enclosed for filing is the Office of Consumer Advocate's Prehearing Memorandum, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink that reads "Christy M. Appleby".

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: Honorable David A. Salapa, ALJ
Certificate of Service

216126

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

I. INTRODUCTION

On April 9, 2015, UGI Utilities, Inc. – Electric Division (UGI or Company) filed a Petition with the Public Utility Commission (Commission) seeking approval of a Phase II Energy Efficiency and Conservation Plan for the period of June 1, 2015, through May 31, 2018 (Phase II EE&C Plan). As the Company notes in its Petition, UGI is not formally subject to the energy efficiency requirements of Act 129 of 2008, because it has fewer than 100,000 customers. 66 Pa. C.S. §2806.1(1). The Commission approved the Company’s voluntary Phase I EE&C Plan, with modifications, in its Order entered October 19, 2011. Petition of UGI Utilities Inc. – Electric Division for Approval of its Energy Efficiency And Conservation Plan, Docket No. M-2010-2210316 (Order entered Oct. 19, 2011) (Phase I Order).

The Company has proposed to modify its program offerings in Phase II. Petition at ¶19. The resulting Plan includes eleven programs. Petition at ¶19. Of the eleven programs, six are available to all Residential customers, including low-income customers, and one additional program is available to only low-income customers. Petition at ¶19. For the Residential class, the Company proposes to continue its customer education and fuel switching programs without modification. Petition Exh. 1 at 3. The Company further proposes to continue its appliance

recycling program with increased rebate levels, and modifying its appliance rebate levels with new equipment qualifications and incentives. Petition Exh. 1 at 3. The Company further proposes to modify its energy efficient lighting program to include LED lights. Petition Exh. 1 at 3. Finally, the Company proposes a new Home Energy Audit, as well as a pilot Low Income Usage Reduction Program (LIURP) Water Heater Replacement Program. Petition Exh. 1 at 3.

On April 29, 2015, the Office of Small Business Advocate (OSBA) filed its Notice of Intervention, Public Statement, and Answer in this proceeding. On May 4, 2015, the Office of Consumer Advocate (OCA) filed its Notice of Intervention, Public Statement, and Answer.

On October 1, 2015, the Company submitted the Supplemental Direct Testimony of Brian J. Meilinger, Paul H. Raab, and William J. McAllister and filed its Amended Phase II EE&C Plan.

The matter was referred to the Office of Administrative Law Judge, and Administrative Law Judge (ALJ) David A. Salapa was assigned to the proceeding. On December 21, 2015, a Prehearing Conference Notice was issued, and a Prehearing Conference was scheduled for January 21, 2016.

In its Answer, the OCA stated that the OCA does not object to UGI's request to continue its EE&C Plan beyond Phase I. The OCA continues to support the Company's efforts to provide cost-effective energy efficiency and conservation programs and measures to its customers. The OCA will work with the parties to help ensure that the programs offered meet the needs of customers while providing energy and conservation benefits on a system-wide basis.

II. ISSUES

As the OCA stated in its Answer to this proceeding, the OCA supports the continuation of cost-effective programs through Phase II. Upon initial review, the Company's Phase II Plan

includes several programs that will benefit residential customers. The OCA will work with the parties to ensure that the programs offered meet the needs of residential customers while providing energy and conservation benefits on a system-wide basis.

III. WITNESSES

The OCA is in the process of selecting an expert witness. The OCA will notify Your Honor and all parties of record of the witness as soon as possible.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Assistant Consumer Advocate Christy M. Appleby and Senior Assistant Consumer Advocate Aron J. Beatty. Copies of all documents should be served as follows:

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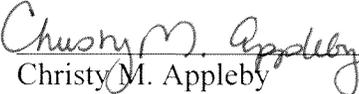
V. DISCOVERY

The OCA does not propose any discovery rule modifications in this proceeding.

VI. PROCEDURAL SCHEDULE

The OCA will work with all parties to develop a mutually agreeable procedural schedule.

Respectfully Submitted,


Christy M. Appleby
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DATE: January 20, 2015

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CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate’s Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 20th day of January 2016.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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SERVICE BY E-MAIL and FIRST CLASS MAIL

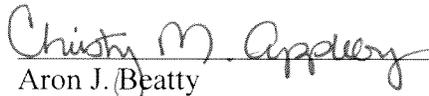
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