

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2016-2580030
Office of Consumer Advocate	:	
Office of Small Business Advocate	:	
	:	
	:	
v.	:	
	:	
UGI Penn Natural Gas, Inc.	:	

**MOTION TO INTERVENE**  
**OF THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER**  
**FEDERAL EXECUTIVE AGENCIES**

Pursuant to 52 Pa. Code § 5.74, the United States Department of Defense and all other Federal Executive Agencies (“DoD/FEA”), by and through its legal counsel, hereby requests that it be granted leave to intervene in the above captioned matter, and in support thereof states:

1. DoD/FEA operates several installations in the State of Pennsylvania. These installations are large users of gas and are served by UGI Penn Natural Gas, Inc. This proceeding will have a significant impact on DoD/FEA. Accordingly, DoD/FEA’s interests are greatly affected by the decision of the Pennsylvania Public Utility Commission and cannot be adequately represented by any other party. If allowed to intervene, DoD/FEA will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.
2. The attorneys authorized to represent DoD/FEA in this proceeding and take service of all documents are:

Lead Counsel: Emily W. Medlyn  
General Attorney  
U.S. Army Legal Services Agency  
Regulatory Law Office (JALS-RL/IP)  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0123  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

Local Counsel: CPT Carlos S. Ramirez-Vazquez  
Litigation and Training Officer  
Trial Counsel Assistance Program  
9275 Gunston Road, Bldg. 1450  
Fort Belvoir, VA 22060  
Telephone: 703-693-0797  
Email: [carlos.s.ramirezvazquez.mil@mail.mil](mailto:carlos.s.ramirezvazquez.mil@mail.mil)

3. A Motion for Pro Hac Vice for Emily W. Medlyn is being filed in conjunction with this motion. Local co-counsel's contact information is provided above.

WHEREFORE, the United States Department of Defense and all other Federal Executive Agencies requests that it be granted leave to intervene as a full party in this proceeding, with all rights attendant to full party status.

Respectfully submitted,



Emily W. Medlyn  
General Attorney  
U.S. Army Legal Services Agency  
Regulatory Law Office (JALS-RL/IP)  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0123  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)



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