



March 11, 2019

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

Re: Pa. PUC v. UGI Gas of Pennsylvania, Inc., Docket No. R-2018-3006814

Dear Secretary Chiavetta,

Enclosed, please find the *Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)* in the above referenced matter. Copies are being served as indicated in the attached Certificate of Service.

Respectfully,

A handwritten signature in black ink, appearing to read "Kadeem Morris", is written over a light gray rectangular background.

Kadeem Morris
Counsel for CAUSE-PA

Cc: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al. :
 :
 v. : Docket No. R-2018-3006814
 :
 UGI Gas of Pennsylvania, Inc. :

Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA First Class Mail and Email

Hon. Christopher P. Pell
Deputy Chief Administrative Law Judge
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
cpell@pa.gov

Jessica R. Rogers, Esq.
Garrett P. Lent, Esq.
Post & Schell, PC
17 North Second Street, 12th Fl
Harrisburg, PA 17101
jrogers@postschell.com
glent@postschell.com

David B. MacGregor, Esq.
Post & Schell, PC
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Kent Murphy, Esq.
Mark C. Morrow, Esq.
Danielle Jouenne, Esq.
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
murphyke@ugicorp.com
morrowm@ugicorp.com
jouenned@ugicorp.com

Steven C. Gray, Esq.
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101
sgray@pa.gov

Scott B. Granger, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Darryl A. Lawrence, Esq.
Lauren M. Burge, Esq.
Christy M. Appleby, Esq.
David T. Evrard, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
dlawrence@paoca.org
lburge@paoca.org
cappleby@paoca.org
devrard@paoca.org

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com

Dan Clearfield, Esq.
Kristine Marsilio, Esq.
Eckert Seamans Cherin & Mellot, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
kmarsilio@eckertseamans.com

Joseph L. Vullo, Esq.
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

VIA First Class Mail Only

Gail L. Hoffer &
Bernadette Margel
594 Royer Drive
Lancaster, PA 17601-5186

Keith P. Dolon
501 Carleton Avenue
Hazleton, PA 18201

Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Kadeem Morris, Esq., PA ID: 324702
118 Locust Street
Harrisburg, PA 17101
717-236-9486
pulp@palegalaid.net

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On February 14, 2019, CAUSE-PA filed a Petition to Intervene, requesting full intervenor status as an active party to the proceeding.

On February 28, 2019, the Commission entered a Suspension and Investigation Order suspending the UGI tariff by operation of law, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained therein. (S&I Order).

II. Issues to be Presented

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, UGI must also ensure that its rates and tariff comply with universal service requirements. In turn, the Commission must ensure that universal service programs assist low-income customers to afford natural gas service, and that these programs are “appropriately funded and available in each natural gas distribution service territory.” 66 Pa. C.S. § 2203(8).

In the event that the Commission approves any natural gas distribution rate increase, the Commission should condition approval on UGI’s agreement to perform such actions as are necessary to assure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of UGI’s proposed tariff changes and testimony, and opposes UGI’s request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues

of concern, which must be addressed in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of UGI's rate filing and proposed rate increase on low income households.
- ii. The effect of UGI's proposed \$19 fixed residential customer charge on low income households across UGI's three rate districts.
- iii. The effect of UGI's rate filing and proposed rate increase on low income households enrolled in or eligible for UGI's Universal Service Programs, and the continued adequacy of those programs in delivering universally accessible natural gas service.
- iv. The availability of Energy Efficiency and Conservation Programming to low income households through UGI's proposed Energy Efficiency and Conservation Plan.

III. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, and reserves the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above, as well as other issues that may arise in the course of this proceeding.

IV. Discovery

CAUSE-PA supports the discovery modifications requested by the Office of Consumer Advocate (OCA) in its Prehearing Memorandum.

V. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement early in the process.

VI. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Elizabeth R. Marx, Esq.
Kadeem G. Morris, Esq.
Patrick M. Cicero, Esq.
John W. Sweet, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
Harrisburg, PA 17102
Telephone: 717-236-9486
Facsimile: 717-233-4088
E-mail: pulp@palegalaid.net

We request that parties serve one hard copy in addition to an electronic copy of all documents served in this proceeding.

VII. Representation of CAUSE-PA at Prehearing Conference

For the purposes of the Prehearing Conference, CAUSE-PA will be represented by Kadeem G. Morris, Esq.

VIII. Litigation Schedule

CAUSE-PA is actively involved in discussions with UGI and other parties to reach a mutually agreeable litigation schedule.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Kadeem G. Morris, Esq. PA ID: 324702

Elizabeth R. Marx, Esq., PA ID: 309014

Patrick M. Cicero, Esq., PA ID: 89039

John W. Sweet, Esq., PA ID: 320182

118 Locust Street

Harrisburg, PA 17101

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