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August 25, 2020

VIA ELECTRONIC FILING


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

**Re: Emergency Order Re: Establishing Public Utility Service Termination
Moratorium, Docket No. M-2020-3019244**

Dear Secretary Chiavetta:

Enclosed for filing at the above-referenced docket is the Petition of UGI Utilities, Inc. – Electric Division and Gas Division to Intervene in the above-referenced docket.

Very truly yours,

DocuSigned by:

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Danielle Jouenne
Counsel for UGI Utilities, Inc.

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Emergency Order Re: Establishing
Public Utility Service Termination
Moratorium**

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Docket No. M-2020-3019244

CERTIFICATE OF SERVICE

I hereby certify that I have, this 25th day of August 2020, served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL:

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Counsel for TURN et al

DocuSigned by:

Danielle Jouenne

45B63AF68F62464...

Danielle Jouenne

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order Re: Establishing Public Utility Service Termination Moratorium	: : :	Docket No. M-2020-3019244
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**PETITION TO INTERVENE OF
UGI UTILITIES, INC. – GAS DIVISION AND ELECTRIC DIVISION**

UGI Utilities, Inc. – Gas Division and Electric Division (“UGI” or the “Company”) hereby files this Petition to Intervene (“Intervention”) in response to the Joint Petition for Due Process Relief (“Joint Petition”) filed on August 5, 2020 by the Tenant Union Representative Network (“Turn”), Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (hereinafter collectively referenced as the “Low Income Advocates”). The Joint Petition seeks the establishment of an on-the-record proceeding to deliberate whether the absolute moratorium on service terminations should be lifted. UGI files this Intervention pursuant to Sections 5.71-5.76 of the regulations of the Pennsylvania Public Utility Commission (“Commission”), 52 Pa. Code §§ 5.71-5.76. In support thereof, UGI respectfully submits as follows:

I. BACKGROUND

1. The name and contact information of UGI is as follows:

UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517

2. UGI’s attorney in this matter is as follows:

Danielle Jouenne, Esquire (PA ID #306839)
Counsel, Energy & Regulation
UGI Corporation

460 N. Gulph Rd
King of Prussia, PA 19406
Phone: (610) 992-3203
E-mail: jouenned@ugicorp.com

All documents in this matter should be served upon the above-identified counsel. In addition, pursuant to 52 Pa. Code § 1.54(b)(3), counsel for UGI consents to the electronic service of all documents at the email addresses shown above.

3. On March 6, 2020, Governor Tom Wolf issued a Proclamation of Disaster Emergency due to the COVID-19 Pandemic.

4. On March 13, 2020, the Office of Consumer Advocate, Office of Small Business Advocate, and Pennsylvania Utility Law Project requested emergency action and guidance from the Commission in response to the COVID-19 Pandemic.

5. On March 13, 2020, Chairman Gladys Brown Dutrieuille issued an Emergency Order (“March 13 Emergency Order”) establishing a prohibition on the termination of public utility service during the Governor’s Proclamation of Disaster Emergency, unless to ameliorate a safety emergency, or otherwise determined by the Commission.

6. On August 5, 2020, the Low Income Advocates filed the Joint Petition seeking the establishment of an on-the-record proceeding in advance of the lifting of the Commission’s absolute moratorium on service terminations.

7. The Joint Petition was not served on UGI. The Joint Petition was served on the Energy Association of Pennsylvania, which is a trade organization and does not represent its members individually in legal proceedings.

8. On August 10, 2020, Chairman Gladys Brown Dutrieuille issued a letter seeking comments at this docket from interested persons and organizations regarding the absolute moratorium and customer protections for at-risk customers.

9. UGI filed comments on August 18, 2020 in response to the Chairman's letter.

10. UGI is a public utility and electric distribution company and natural gas distribution company that provides electric service to approximately 62,000 retail customers located in two counties in Pennsylvania and natural gas service to 660,000 retail customers in Pennsylvania.

11. UGI seeks to intervene in this proceeding because the relief sought by the Low Income Advocates – the delay of the repeal of the absolute termination moratorium – will impact the operations of UGI as UGI is a public utility subject to the jurisdiction of the Commission and the March 13th Emergency Order.

12. A petition to intervene in this proceeding is permitted by an entity representing “an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2).

13. As explained above, UGI may be directly affected by the outcome of his proceeding. UGI's interest in this proceeding is direct, immediate and substantial, and is not adequately represented by any other parties. Therefore, UGI satisfies the standards for intervention under the Commission's regulations. 52 Pa. Code § 5.72(a).

14. UGI reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

WHEREFORE, UGI Utilities, Inc. respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene.

Respectfully submitted,

DocuSigned by:
Danielle Jouenne
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Danielle Jouenne, Esquire (PA ID #806329)
Counsel, Energy & Regulation
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Date: August 25, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

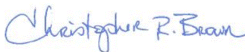
**Emergency Order Re: Establishing Public
Utility Service Termination Moratorium**

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Docket No. M-2020-3019244

VERIFICATION

I, Christopher R. Brown, Vice President and General Manager Rates & Supply for UGI Utilities, Inc. hereby state that the facts set forth 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).

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Christopher R. Brown

Date: August 25, 2020