



May 17, 2021

Richard P. Bonnifield
1150 Eighteenth Street NW, Suite 325
Washington, DC 20036
D. 202.398.1761
richard.bonnifield@stoel.com

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: UGI Utilities, Inc., Docket Nos. ER06-1445-000 and ER06-1445-001
Formula Rate Informational Filing: 2021 Transmission Revenue Requirement

Dear Secretary Bose:

UGI Utilities, Inc. (“UGIU”) recovers its annual transmission revenue requirement through a cost-of-service formula rate under Attachment H-8 of the open access transmission tariff (“OATT”) of PJM Interconnection, LLC (“PJM”).¹ UGIU’s cost-of-service formula rate is on file with the Federal Energy Regulatory Commission (“FERC”) in Docket Nos. ER06-1445-000 and ER06-1445-001.² Through its cost-of-service formula rate under PJM OATT Attachment H-8C, UGIU determines and recovers its annual transmission revenue requirement.

UGIU’s Formula Rate Implementation Protocols under PJM OATT Attachment H-8D provide that UGIU will annually recalculate its annual transmission revenue requirement for the rate year commencing June 1st by inputting cost data from the Form 1 annual report filed with FERC to derive its updated “Annual Transmission Revenue Requirement” (“Annual Update”), from which UGIU’s components of the total transmission service charges in the “PPL Group Zone” of PJM are determined.

UGIU’s Formula Rate Implementation Protocols further provide that UGIU will both post its Annual Update on PJM’s Internet website via a link to the Transmission Services page or similar successor page and file such Annual Update with FERC as an informational filing.

In compliance with its Formula Rate Implementation Protocols, UGIU submits the attached Annual Update to FERC as an informational filing. The Annual Update, enclosed as Attachment

¹ Concurrently with this filing and after discussions with FERC Staff, UGIU is making an amendment to the pending tariff filing submitted in compliance with Order No. 864 on May 15, 2020, in Docket No. ER20-1831-000 to update its transmission formula rate template. In addition, UGIU is concurrently making a separate tariff filing to revise its formula rate template and formula rate implementation protocols to address changes in depreciation rates in compliance with Recommendation No. 47 of the final Audit Report of UGIU, issued on January 14, 2021, in Docket No. FA20-3-000 (“Audit Report”).

² *UGI Utilities, Inc.*, Letter Order, Docket Nos. ER06-1445-000 and ER06-1445-001 (Dec. 13, 2006).

A, is comprised of detailed calculations conducted through UGIU's cost-of-service formula rate as populated with data from UGIU's 2020 annual report on FERC Form 1, together with supporting data and workpapers.³ UGIU's Annual Transmission Revenue Requirement changes from \$7,759,086 for the period ending May 31, 2021, to \$9,637,615 for the period June 1, 2021, through May 31, 2022.⁴ As explained in footnote 3 on page 5 of the Annual Update, the reconciliation amount (*i.e.*, the true-up) includes a revenue reduction of \$1,070,773 attributable to the submitted and approved refund analysis from the Audit Report of UGIU, issued on January 14, 2021, in Docket No. FA20-3-000. Including the reconciliation amount, the Net Revenue Requirement is \$10,321,915.⁵

The change in the Net Revenue Requirement causes UGIU's contribution to the Annual Network Service Charge in the PPL Group Zone to change from \$991 per megawatt per year to \$1,422 per megawatt per year.

UGIU notes that under its reconcilable default service cost rate recovery mechanism approved by the Pennsylvania Public Utility Commission effective January 1, 2010, it recovers certain transmission costs associated with its provision of default generation service directly from retail default generation service customers. Accordingly, it has excluded from its Annual Transmission Revenue Requirement transmission expenses recorded in Account No. 565 and certain other excluded transmission expenses. The detail of UGIU's exclusion of such cost is shown in Attachment 5 ("Cost Support") on the line "Excluded Transmission O&M Expenses."

Thank you for your attention to this informational filing. Please contact the undersigned if you have any questions.

³ The Annual Update includes adjustments taken in compliance with the recommendations from the Audit Report. Specifically, UGIU: (i) made adjustments to plant in service, accumulated depreciation, and depreciation expense for its Total Electric Division, which impacts the gross and net plant allocation factors used in Attachment H; (ii) made adjustments to plant in service, accumulated depreciation, and depreciation expense for Transmission Operations which is reflected to the appropriate lines in Attachment H and Attachment 5; and (iii) made adjustments to AFUDC, which are not reflected in the FERC Form 1 for calendar year 2020. Costs incurred due to the Audit were reclassified, as explained in footnote 2 to Attachment H.

⁴ Section 4 of Attachment H-8D states in relevant part: "Any changes to the data inputs, including but not limited to revisions to UGIU's FERC Form No. 1...shall be incorporated into the Formula Rate and charges produced by the Formula Rate (with interest determined in accordance with 18 C.F.R. § 35.19a) in the Annual Update for the next effective Rate Period. This reconciliation mechanism shall apply in lieu of mid-Rate Year adjustments and any refunds or surcharges...."

⁵ This is shown on Line 174 of Attachment H.

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Respectfully submitted,

/s/ Richard P. Bonnifield
Richard P. Bonnifield
Melan A. Patel
Stoel Rives LLP
1150 18th Street, NW, Suite 325
Washington, DC 20036
Telephone: (202) 398-1761
Fax: (202) 621-6394
richard.bonnifield@stoel.com
melan.patel@stoel.com

Attorneys for UGI Utilities, Inc.

Enclosures
cc: PJM Interconnection, LLC

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 17th day of May 2021.

/s/ Richard P. Bonnifield

Richard P. Bonnifield

Stoel Rives LLP

1150 18th Street NW, Suite 325

Washington, D.C. 20036

Telephone: (202) 398-1761

richard.bonnifield@stoel.com