

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Centre Park Historic District	:	
	:	Docket No. C-2015-2516051
v.	:	
	:	
UGI Utilities, Inc.	:	
	:	
City of Reading	:	
	:	Docket No. C-2016-2530475
v.	:	
	:	
UGI Utilities, Inc.	:	

REPLY TO PETITION FOR PROTECTIVE ORDER

Centre Park Historic District (“CPHD”) and the City of Reading (the “City”) file this Reply to the Petition for Protective Order filed by UGI Utilities, Inc., (“UGI”):

I. BACKGROUND

1. On March 8, 2017, UGI filed this Petition for Protective Order, attaching a proposed Order.
2. According to the Petition, UGI requests a Protective Order on the basis that “it may be necessary for participants to disclose confidential information in filings with the Commission, through discovery responses or through evidence introduced into the record.” [UGI’s Petition, ¶ 8.]
3. Included among the confidential and proprietary information UGI seeks to protect is “confidential information about UGI’s customers, operations, and facilities.” [UGI’s Petition, ¶ 9.]
4. Rather than identify specific confidential and proprietary information, UGI proposes to identify documents containing confidential and proprietary information by marking the documents “Confidential”, by stamp or otherwise, when produced.

5. UGI's Petition for Protective Order follows a conference between the parties on March 7, 2017, for the purpose of resolving discovery disputes in this matter, including UGI's objections to certain discovery requests propounded by the City and CPHD on August 16, 2016.

II. REPLY TO PETITION FOR PROTECTIVE ORDER

6. The City and CPHD incorporate paragraphs 1 through 5, *supra*, as if fully set forth.

7. To the extent UGI seeks a Protective Order to protect documents requested by the City and CPHD in their discovery requests, its Petition for Protective order needed to be filed in August 2016.

8. Notwithstanding, in the interest of resolving some of UGI's objections to the discovery requests of the City and CPHD, the City and CPHD have no specific objection to UGI's request for a Protective Order, with the understanding that the Proposed Order contemplates access to confidential and proprietary information by the City and CPHD's counsel and witnesses.

9. The City and CPHD reserve the right to challenge or question the confidential or proprietary nature of documents identified as such by UGI, as contemplated in UGI's proposed order, and as permitted by 52 Pa. Code § 5.365.

10. The City and CPHD hope that with the Protective Order UGI will provide full and complete discovery responses.

WHEREFORE, the City and CPHD respectfully request that the Administrative Law Judge enter an order consistent with this reply.

EASTBURN AND GRAY, P.C.

/s/ Michael E. Peters

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Dated: March 13, 2017

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CENTRE PARK HISTORIC DISTRICT, INC. :
: :
vs. : Docket No. C-2015-2516051
: :
UGI UTILITIES, INC. :

City of Reading, :
: :
v. : Docket No. C-2016-2530475
: :
UGI Utilities, Inc. :

CERTIFICATE OF SERVICE

It is hereby certified that on March 13, 2017, Michael E. Peters, Esquire served, by electronic mail a true and correct copy of the foregoing Answer to Petition for Protective Order on the following:

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By: _____
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