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March 13, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Centre Park Historic District v. UGI Utilities, Inc.
Docket No. C-2015-2516051**

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

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of UGI Utilities, Inc., in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

cc: Certificate of Service
Honorable Mary D. Long

CERTIFICATE OF SERVICE
(Docket Nos. C-2015-2516051 and C-2016-2530475)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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Date: March 13, 2017


Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM OF
UGI UTILITIES, INC.**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to 52 Pa. Code § 5.222(d) and Administrative Law Judge Mary D. Long’s (the “ALJ”) Fifth Prehearing Order dated February 22, 2017, UGI Utilities, Inc. (“UGI” or the “Company”) hereby submits this Prehearing Conference Memorandum.

As explained herein, over a year after the City and CPHD filed their Formal Complaints in this proceeding, UGI still does not know the specific meters at issue and the specific reasons why the City of Reading (“City”) and Centre Park Historic District (“CPHD”) (collectively, “Complainants”) contend that the each meter installation violates the Commission’s regulations. Over eight months ago, UGI propounded discovery on the Complainants requesting this information. Since August 2016, the Complainants have on multiple occasions told UGI that they would be providing complete responses to UGI’s discovery, including a meter by meter survey that identifies the specific meters are issue and that provides the specific reasons why the Complainants believe that each meter is not in compliance. Repeatedly, the Complainants failed

to uphold their commitments to provide these responses. It was only on Sunday evening, three business hours before this prehearing memorandum was due, that the Complainants finally provided a meter by meter survey. Although UGI still is in the process of reviewing and analyzing the survey, it appears that several portions of the survey are incomplete and missing information. The Company will be prepared to discuss these issues at the prehearing conference.

In addition, the Company recognizes that the ALJ requested the parties to jointly propose a procedural schedule for this proceeding. However, at this time, the Company cannot state for certain how many days of hearings will be required for all parties to finish the presentation of their cases. Indeed, the Complainants have had the meter by meter survey for over six months and were unable to state specifically how long it will take to present their case. Therefore, as explained below, the Company respectfully requests that the ALJ: (1) adopt the procedural schedule proposed by UGI incorporating written testimony; or (2) alternatively, adopt the procedural schedule proposed by all parties that has a start date for hearings but no end date.

I. BACKGROUND

On November 25, 2015, CPHD filed a Formal Complaint at Docket No. C-2015-2516051 alleging that UGI's meter location practices in the historic districts of Reading, PA violated the Commission's regulations.

On December 15, 2015, UGI filed an Answer to CPHD's Complaint denying that the Company committed any regulatory violation.

On February 11, 2016, a prehearing conference was held before the ALJ regarding CPHD's Complaint and three other customer complaints about UGI's meter placement decisions. At the prehearing conference, counsel for CPHD indicated that he would also be filing a

complaint on behalf of the City about UGI's meter location practices in Reading, PA and requested that CPHD's Complaint be consolidated with the City's forthcoming Complaint.

On February 16, 2016, the ALJ issued the First Prehearing Order that, among other things, scheduled a further telephonic prehearing conference for March 30, 2016.

On February 23, 2016, UGI received e-service of the City's Complaint. In its Complaint, the City generally alleged that UGI violated 52 Pa. Code § 59.18(d)(1) by failing to "consider" inside meter locations for historic buildings and for buildings in historic districts in Reading, PA. Moreover, the City contended that UGI's exterior meter location practices have created unsafe conditions.

On March 1, 2016, a Notice was issued scheduling the further telephonic prehearing conference for March 30, 2016.

On March 14, 2016, UGI filed an Answer denying the material allegations in the City's Complaint and averring that its meter location practices have been consistent with the Commission's regulations. Additionally, the Company filed Preliminary Objections, which argued that the City's Complaint should be dismissed in its entirety due to the legal insufficiency of the City's requested relief.

On March 24, 2016, the City filed an Answer to UGI's Preliminary Objections.

On March 29, 2016, the ALJ issued an Interim Order Dismissing Preliminary Objections.

On March 30, 2016, the prehearing conference was held, during which the parties agreed to attempt to settle the Complaints and hold a further prehearing conference in 60 days.

On April 5, 2016, a Notice was issued scheduling the further telephonic prehearing conference for June 30, 2016. Ultimately, the prehearing conference was rescheduled for July 14, 2016.

At the July 14, 2016 prehearing conference, UGI, the City, and CPHD provided the ALJ with an update on settlement discussions. The ALJ also established a litigation schedule, with discovery concluding September 9, 2016, and evidentiary hearings taking place on November 15-16, 2016. This litigation schedule was memorialized in the ALJ's Third Prehearing Order issued on July 15, 2016.

On August 10, 2016, I&E filed a Notice of Appearance.

On September 1, 2016, UGI filed a Petition with the Commission seeking interlocutory review and answers to material questions. Further, UGI and I&E filed a Joint Motion that requested the ALJ to extend the procedural schedule, hold a further prehearing conference, and modify the hearing format in this proceeding.

On September 2, 2016, the ALJ issued the Fourth Prehearing Order, which suspended the litigation schedule pending the Commission's ruling on UGI's Petition for Interlocutory Review and Answer to Material Questions.

On September 9, 2016, the City and CPHD filed their Brief in Opposition to UGI's Petition for Interlocutory Review and Answer to Material Questions.

On September 12, 2016, UGI filed its Brief in Support of the Company's Petition for Interlocutory Review and Answer to Material Questions.

On September 13, 2016, the Commission issued a Secretarial Letter that waived the 30-day period for ruling on petitions for interlocutory review.

On December 30, 2016, the City and CPHD filed a Motion for Special Relief, asking the Commission to rule on UGI's Petition for Interlocutory Review and Answer to Material Questions. UGI filed an Answer in response on January 23, 2017.

On February 9, 2017, the Commission entered an Order declining to answer the material questions and remanding the case to the ALJ.

On February 22, 2017, the ALJ issued the Fifth Prehearing Order that scheduled a further prehearing conference and directed the parties to file and serve prehearing memoranda before 12:00 PM on March 13, 2017.

On March 8, 2017, UGI filed a Petition for Protective Order as well as a Motion to Dismiss Objections and Compel Responses regarding the Company's first set of discovery propounded on the Complainants.

II. SERVICE OF DOCUMENTS

UGI's attorneys in this proceeding are Mark C. Morrow, Esquire, Danielle Jouenne, Esquire, David B. MacGregor, Esquire, Devin T. Ryan, Esquire, and Christopher T. Wright, Esquire. UGI requests that Christopher T. Wright and Devin T. Ryan be listed as the recipients for service. Mr. Wright and Mr. Ryan's contact information is provided below:

Christopher T. Wright (ID # 203412)
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UGI also requests that Mr. Morrow, Ms. Jouenne and Mr. MacGregor be added to any informal e-mail distribution lists in this proceeding. Mr. Morrow's e-mail address is morrowm@ugicorp.com, Ms. Jouenne's e-mail address is jouenned@ugicorp.com, and Mr. MacGregor's e-mail address is dmacgregor@postschell.com. In addition, UGI agrees to receive service of documents electronically in this proceeding.

III. ISSUES

UGI believes the presently identified issues are:

1. Whether UGI has failed to “consider” inside meter locations for historic buildings and for buildings in historic districts in violation of 52 Pa. Code 59.18(d)(1).
2. When selecting outside meter locations, whether the Company “consider[ed] potential damage by outside forces,” located gas meters in “protected location[s] adjacent to the building served,” and protected those meters from “vehicular damage that may be anticipated.” *See* 52 Pa. Code § 59.18(a)(5),(b)(1); 49 C.F.R. § 192.353 (adopted by the Commission in 52 Pa. Code § 59.33(b)).
3. Whether the City and CPHD are seeking to rewrite the Commission’s regulations through this complaint proceeding.
4. Whether the City has the authority to challenge meter location decisions in lieu of affected property owners.

IV. STATUS OF DISCOVERY

Throughout this proceeding, UGI has made good faith efforts to resolve all discovery disputes with the City and CPHD informally. However, the City and CPHD repeatedly failed to provide full and complete responses to all of UGI’s discovery, despite their multiple assurances that they would do so. As a result, nearly eight months after UGI originally propounded its interrogatories and requests for production of documents, the City and CPHD still had not provided full and complete responses to all of UGI’s discovery.

Importantly, UGI’s first set of discovery, which was served on July 22, 2016, asked the City and CPHD identify each meter at issue and state the reasons why that meter installation violated the Commission’s regulations. As early as September 9, 2016, the City and CPHD

affirmatively stated that the survey was complete. *See* Brief in Opposition to Petition of UGI Utilities, Inc. for Interlocutory Review and Answer to Material Questions, Docket Nos. C-2015-2516051, C-2016-2530475, p. 6 (Sept. 9, 2016) (“[T]he City has performed an extensive meter-by-meter survey, identifying violations of Amended § 59.18 throughout the City.”); *see also* Motion for Special Relief in Form of Disposition of Petition for Interlocutory Review, Docket Nos. C-2015-2516051, C-2016-2530475, p. 2 (Dec. 29, 2016) (“[T]he City has performed a meter-by-meter analysis for the Administrative Law Judge’s consideration.”) Nevertheless, the City and CPHD repeatedly failed to provide the survey to UGI, despite their several assurances that they would. It was only on Sunday evening, three business hours before this prehearing memorandum was due, that the Complainants finally provided supplemental and revised discovery responses, including the meter by meter survey. Even still, based on a preliminary review, the survey appears to be incomplete and missing certain information. Consequently, over a year after the City and CPHD filed their Complaints, UGI still does not know: (1) the specific meters at issue; and (2) the specific reasons why the City and CPHD believe the meter installations violate the Commission’s regulations. The City and CPHD’s repeated failures to provide this basic information about the scope of their Complaints have wasted valuable time and severely prejudiced UGI in the preparation of its case.

To provide a complete picture of UGI’s efforts to resolve the discovery disputes informally, as well as the City and CPHD’s repeated failures to uphold their commitments, the sections below set forth a full accounting of the status of discovery. Moreover, UGI complied with the ALJ’s directive in the Fifth Prehearing Order that the Company must confer with the other parties about any outstanding discovery disputes prior to the prehearing conference, as the

Company conferred with the City and CPHD about the outstanding discovery disputes on March 7, 2017.

A. UGI TO CITY & CPHD SET I

On July 22, 2016, UGI served Interrogatories and Requests for Production of Documents on the City of Reading and Centre Park Historic District – Set I (“UGI to City & CPHD Set I”) by email and first class mail. Pursuant to the discovery schedule adopted in this proceeding, objections to UGI to City & CPHD Set I were due on or before August 1, 2016, and responses were due on or before August 11, 2016.

The Complainants served no objections to UGI’s Interrogatories and Requests for Production of Documents by the due date of August 1, 2016.

On August 8, 2016, counsel for UGI received a call from counsel for the City and CPHD regarding the status of answers to UGI to City & CPHD Set I. Counsel for the City and CPHD indicated that they intended to respond to the discovery by August 11, 2016, but that they were having difficulty in gathering information to answer subparts of one of the questions – UGI to City & CPHD-I-5(i)(j) – regarding the meter-by-meter survey. Counsel for the City and CPHD stated that a status update on that response would be provided on August 12, 2016, or August 15, 2016. Counsel for UGI requested that any responses to discovery that were otherwise ready be provided in a timely fashion, *i.e.*, on or before the August 11, 2016 due date.

The City and CPHD failed to provide any discovery responses by the August 11, 2016 due date. Further, the City and CPHD’s counsel failed to provide a status update on the outstanding discovery by August 15, 2016, as promised.

On August 15, 2016, counsel for UGI attempted to contact the City and CPHD’s counsel but was unsuccessful. UGI’s counsel and the City and CPHD’s counsel eventually spoke on August 16, 2016, at which point the City and CPHD’s counsel again advised that the responses

were not ready. UGI's counsel was further advised that the City and CPHD would attempt to answer most of the responses by August 17, 2016, but that the answer to UGI to City & CPHD-I-5(i)-(j) would not be ready to serve. On August 17, 2016, the City and CPHD served objections and answers to UGI's discovery. Many of the answers failed to provide full and complete responses, and the City and CPHD did not provide the meter-by-meter survey requested by UGI.

On August 23, 2016, counsel for UGI left a voicemail for the City and CPHD's counsel to discuss the untimely objections. Counsel for the City and CPHD and counsel for UGI eventually spoke about the objections on August 24, 2016, but were unable to resolve any of the objections informally. During that same call, counsel for the City and CPHD advised that some responses to UGI to City & CPHD Set I would be further supplemented the following week.

In a further effort to resolve the outstanding discovery dispute, the parties had a conference call on August 26, 2016. During the conference call, counsel for the City and CPHD advised that they would be serving supplemental responses to UGI to City & CPHD Set I, Questions 5, 7, 8, 10, 12, 13, 16, and 18. Moreover, regarding the answers and/or objections to UGI to City & CPHD Set I, Questions 11, 15, 17, and 20, they advised that they would provide revised responses that fully answer those questions. Counsel for the City and CPHD further represented that all of the revised and supplemental responses would be served by September 2, 2016. After the call, UGI's counsel sent an email to the City and CPHD's counsel memorializing their commitments to provide revised and supplemental responses.

None of the revised and supplemental responses were served.

On February 14, 15, 16, and 17, 2017, counsel for UGI left voicemails for the City and CPHD's counsel about scheduling the further prehearing conference and asking about the status of the revised and supplemental responses to UGI's discovery.

On February 17, 2017, counsel for the City and CPHD finally returned the voicemails and represented that the revised and supplemental responses were ready to be served prior to the litigation schedule being stayed by the ALJ. Counsel for the City and CPHD further stated that the responses would be provided the following week.

None of the revised and supplemental responses were served the following week.

On March 1, 2017, counsel for UGI sent an email to the City and CPHD's counsel requesting that they provide the status of these revised and supplemental responses, noting that these discovery requests were originally propounded on July 22, 2016, and recounting their repeated failures to uphold their multiple commitments to provide the revised and supplemental responses.

On March 2, 2017, counsel for UGI again sent an email to the City and CPHD's counsel asking about the status of the revised and supplemental responses to UGI's discovery.

On March 7, 2017, counsel for UGI and counsel for the Complainants had a conference call to discuss, among other things, the status of the Complainants' revised and supplemental responses to UGI's discovery. Although counsel for the Complainants acknowledged that the meter-by-meter survey was complete and that they had previously agreed to provide the survey, counsel for the Complainants intimated that they would not provide revised and supplemental responses until UGI provided supplemental responses to the Complainants' discovery.

On March 8, 2017, UGI filed a Motion to Dismiss Objections and Compel Responses regarding UGI to City & CPHD Set I.

On March 12, 2017, at 6:40 PM, counsel for the Complainants sent an email to counsel for the other parties with a link to the purported supplemental discovery responses. As

mentioned previously, UGI is still in the process of reviewing the supplemental discovery responses at this time.

B. THE CITY'S FIRST SETS OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

On August 17, 2016, the City and CPHD served their first sets of Interrogatories and Requests for Production of Documents on UGI. On August 29, 2016, UGI served timely Objections to the City and CPHD's first sets of discovery. Specifically, UGI objected to Interrogatories 3, 5, 11, 12, 14, 16, 25, 26, 30, 34, and 36 and Requests for Production of Documents 3, 5, 7, 10, 11, 15, 17, 19, 21, 23, 29, 31, and 33.

On August 31, 2016, counsel for UGI left a voicemail for the City and CPHD's counsel to discuss the outstanding discovery disputes and the possibility of entering into a stipulation intended to facilitate the resolution of the outstanding discovery disputes, as well as minimize the discovery needed and reduce the volume of data produced in response to discovery in this proceeding.

Counsel for the City and CPHD never returned this voicemail.

On September 2, 2016, Administrative Law Judge Mary D. Long (the "ALJ") issued the Fourth Prehearing Order, which suspended the litigation schedule.

On September 6, 2016, counsel for UGI again left a voicemail for the City and CPHD's counsel to discuss the status of UGI's responses to the City and CPHD's discovery.

Again, counsel for the City and CPHD never returned this voicemail.

On September 8, 2016, the City and CPHD filed a Motion to Compel Discovery Responses. Prior to filing the Motion, counsel for the City and CPHD did not contact UGI's counsel to discuss informally resolving the Company's objections to discovery, even though UGI reached out multiple times to the City and CPHD's counsel. Moreover, the ALJ's Third

Prehearing Order requires parties to try to resolve discovery disputes informally before filing formal motions to compel. Indeed, the Third Prehearing Order states in bold lettering: “**All motions to compel must contain a certification of counsel of the informal discovery undertaken and their efforts to resolve their discovery disputes informally.**” Third Prehearing Order, Ordering Paragraph 1 (July 15, 2016) (emphasis in original).

On October 7, 2016, UGI served Answers to the City and CPHD’s discovery requests to which the Company did not previously object.

On March 1, 2017, counsel for UGI emailed counsel for the City and CPHD about scheduling a call to discuss the issues raised by the City and CPHD’s Motion to Compel. A call was scheduled for March 7, 2017, at 3:00 PM.

On March 7, 2017, the conference call was held as scheduled. Counsel for UGI and counsel for the City and CPHD discussed potential limitations or modifications to the discovery requests and responses to resolve their dispute about the City and CPHD’s discovery.

On March 10, 2017, counsel for UGI left a voicemail for the City and CPHD’s counsel requesting that they further discuss potentially resolving the discovery disputes raised by the City and CPHD’s Motion to Compel on Monday, March 11, 2017.

V. PROCEDURAL SCHEDULE

As stated previously, UGI still does not know: (1) the specific meter installations at issue; and (2) the specific reasons why the City believes each meter installation violates the Commission’s regulations. Previously, counsel for the City and CPHD have told counsel for UGI that they should simply assume that all meter installations are at issue. If that truly is the case, there have been approximately 1,300 meter relocations related to UGI’s betterment projects in the City since September 2014 and there are approximately 8,900 meters in exterior locations

in the City. The issues raised by the City and CPHD could require fact-intensive inquiries, such as going meter by meter to address the specific issues raised by the City with respect to each meter location. Such individualized investigations could involve addressing how the Company's meter placement was in compliance with 52 Pa. Code § 59.18, the Company's communications and negotiations with the property owner in selecting meter locations, whether the meter's location is in a "protected location" or otherwise complies with 52 Pa. Code § 59.33, whether the meter installation is in compliance with the Company's meter installation policy, and any other issues that may be raised by the City and CPHD. Indeed, many of UGI's decisions were made by its personnel on a case-by-case basis. Therefore, it would take a substantial amount of time for a thorough and complete review of these meter installations if such review took place at an in-person hearing.

For example, assume that it would take even as little as five minutes for the City and CPHD to present their direct case for each meter, five minutes for UGI to cross-examine the City and CPHD's witness about each meter, five minutes for UGI to present its rebuttal case for each meter, and five minutes for the City and CPHD to cross-examine UGI's witness about each meter. That is 20 minutes per meter installation. Therefore, if the City truly is contesting every exterior meter relocation in the City related to UGI's betterment projects (*i.e.*, 1,300 meter installations), it would take at least 433 hours, *i.e.*, approximately 54 days of hearings, to complete this case. Further, although UGI is still reviewing the Complainants' meter by meter survey that was supposed to identify the meters at issue and the alleged violations of each installation, the Complainants' survey identifies over 1,000 exterior meter locations in historic districts and over 700 exterior meter locations in non-historic districts. A complete, in-person review of each of those installations would take at least 566 hours, *i.e.*, approximately 71 days of

hearings.

In addition, UGI maintains that its estimates are on the low-end, considering the City and CPHD have raised a broad range of issues for the meters, I&E may be presenting its witness and cross-examining witnesses about the meter installations, and the issues raised by each meter installation may require additional time to examine, such as the location of the meter in relation to a window or a handicapped parking spot. Notwithstanding, without a full and complete account of what meters are at issue and what the City and CPHD are actually contesting about each meter installation, UGI cannot state precisely how many days for hearings are required at this time.

Due to the City and CPHD's repeated failures to provide the meter-by-meter survey to UGI, the Company's continued lack of knowledge as to the specific scope of this case, and the potential problems in providing UGI with a meaningful opportunity to investigate and respond when evidence is provided for the first time at a scheduled evidentiary hearing, UGI respectfully requests that the ALJ direct that written testimony shall be used in this proceeding consistent with the following schedule:

City Direct Testimony – April 20, 2017

Other Parties' Direct Testimony – June 5, 2017

Rebuttal Testimony – July 6, 2017

Surrebuttal Testimony – July 27, 2017

Hearings – August 15-17, 2017

Main Briefs – September 21, 2017

Reply Briefs – October 12, 2017

In the alternative, UGI respectfully requests that the ALJ adopt the schedule proposed by all parties that has a start date for hearings but no end date. As explained previously, UGI cannot

state precisely how many days would be required for hearings. If an end date for in-person hearings were established now, the Company could be substantially prejudiced if the Complainants' direct case takes so long that UGI will not have enough time to present its case in rebuttal. Indeed, it is very telling that even though the Complainants have had this information, they cannot state specifically how many days of hearings will be needed to present their case. As a result, the best that the parties could do was agree to a schedule that had a start date for hearings but no end date. Specifically, the following schedule was agreed to by all parties:

Completion of Discovery – May 15, 2017

Dispositive Motions – June 30, 2017

Hearings – beginning August 28, 2017, and continuing until the completion of all parties' presentations.

The Company also requests that as the hearings progress, any of the parties, if necessary, may be able to request breaks to accommodate their schedules and their witnesses' schedules. UGI also reserves its right to request that the ALJ extend the discovery completion date depending on the progress of discovery.

VI. DISCOVERY RULES

UGI proposes no modifications to the Commission's discovery rules. The Company is willing to work with the parties, through informal discovery, to expedite any additional discovery.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

On March 8, 2017, UGI filed a Petition for Protective Order, which remains pending before the ALJ. The Company has taken and will continue to take appropriate steps to limit and protect the disclosure of confidential customer information.

VIII. SETTLEMENT

UGI remains willing to work with the parties to resolve this proceeding through settlement. Further, UGI would be willing to enter into a partial settlement, stipulate to certain facts, or both, in order to narrow the issues in this proceeding.

Respectfully submitted,



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Date: March 13, 2017

Attorneys for UGI Utilities, Inc.