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File #: 165082

April 17, 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 Answer of UGI Utilities, Inc. to the Application for Modification of Sixth Prehearing Order filed by Centre Park Historic District and the City of Reading 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**

Michael J. Savona, Esquire  
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PO Box 3265  
Harrisburg, PA 17105-3265

Date: April 17, 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.	:	

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**ANSWER OF UGI UTILITIES, INC.  
TO THE COMPLAINANTS'  
APPLICATION FOR MODIFICATION OF SIXTH PREHEARING ORDER**

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**TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:**

Pursuant to 52 Pa. Code § 5.61, UGI Utilities, Inc. (“UGI” or the “Company”) hereby files this Answer to the “Application for Modification of Sixth Prehearing Order” filed by Centre Park Historic District (“CPHD”) and the City of Reading (“City”) (collectively, “Complainants”), in which the Complainants request a one-week extension to submit the spreadsheets required by the Sixth Prehearing Order and request that they not be required to provide on the spreadsheets the date each meter was relocated. Provided that UGI receives a corresponding one-week extension to provide its updates to the spreadsheets as required by the Sixth Prehearing Order, the Company does not oppose the Complainants’ requests.

In support of its Answer, UGI states as follows:

1. The above-captioned proceeding was initiated by Formal Complaints filed CPHD on November 25, 2015, at Docket No. C-2015-2516051, and by the City on February 23, 2016, at Docket No. C-2016-2530475, regarding UGI's meter location practices in Reading, Pennsylvania.<sup>1</sup>

2. Prehearing conferences were held on February 11, 2016, March 30, 2016, July 14, 2016, and March 16, 2017.

3. Following the March 16, 2017 prehearing conference, Administrative Law Judge Mary D. Long (the "ALJ") issued her Sixth Prehearing Order, which, among other things, directed the following:

1. That the Complainants will create a spreadsheet which includes a list of the contested meters in historic districts in a format substantially similar to the tables in Exhibit D which was attached to the City of Reading's formal complaint. In addition to the columns included in Exhibit D, the Complainants shall add columns to the table which include 1) the date a permit was issued, if one was issued; and 2) the date the meter was relocated. This spreadsheet shall be served on me and on the other parties on or before **April 20, 2017**.

2. That the Complainants shall create a spreadsheet which includes a list of the contested meters which are not located in historic districts in a format substantially similar to the tables in Exhibit D which was attached to the City of Reading's formal complaint. In addition to the columns included in Exhibit D, the Complainants shall add columns to the table which include 1) the date a permit was issued, if one was issued; and 2) the date the meter was relocated. The contested meters shall be organized by neighborhood or proximity. This spreadsheet shall be served on me and on the other parties on or before **April 20, 2017**.

3. That UGI shall respond by adding an additional column which includes either its stipulation to the data provided or by specific objection. UGI's stipulation shall not be construed as an admission that the meter relocation is in violation of the Public Utility Code, regulations or directives of the Commission. UGI's

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<sup>1</sup> A detailed procedural history can be found in UGI's Prehearing Memo filed on March 13, 2017, and is incorporated herein by reference.

responses shall be served on me and the other parties on or before May 4, 2017.

Sixth Prehearing Order, p. 3 (emphasis in original).

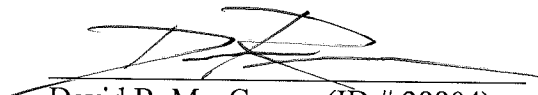
4. On April 14, 2017, the Complainants filed the instant Application requesting that the Sixth Prehearing Order be modified so that: (1) the Complainants have until April 27, 2017, to submit their spreadsheets; and (2) the Complainants do not have to provide the date each meter was relocated. In support, the Complainants contend that they need more time to pull the relevant data about the building and trades permits and that they do not have information about the dates that the meters were relocated.

5. UGI does not oppose the Complainants' requests, so long as the Company is provided until May 11, 2017, to provide its updates to the spreadsheets required by the Sixth Prehearing Order. Absent a corresponding one-week extension for UGI, the Company would be prejudiced and only have one week to update the spreadsheets, rather than the two weeks originally provided under the Sixth Prehearing Order. Thus, if the ALJ grants the Complainants' requests, UGI should be provided until May 11, 2017, to update the spreadsheets.

WHEREFORE, for the reasons set forth above, UGI Utilities, Inc. does not oppose the Complainants' Application for Modification of Sixth Prehearing Order, provided that it receive a corresponding one-week extension (*i.e.*, until May 11, 2017) to provide its updates to the spreadsheets required by the Sixth Prehearing Order.

Respectfully submitted,

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Date: April 17, 2017

Attorneys for UGI Utilities, Inc.