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April 17, 2018

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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 on behalf of Complainant City of Reading is its Motion for Continuance and Scheduling of Status Conference in the above-referenced matters. Copies of the Motion are being served in accordance with the attached certificate of service.

Should you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Enclosure

cc: Certificate of Service

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.	:	

**MOTION FOR CONTINUANCE
AND SCHEDULING OF STATUS CONFERENCE**

TO THE HONORABLE MARY D. LONG, ADMINISTRATIVE LAW JUDGE (“ALJ”):

Pursuant to 52 Pa. Code §§ 1.15(b) and 5.103, Complainant City of Reading (“City”), by and through its undersigned counsel, hereby files this unopposed Motion seeking a continuance of the litigation schedule and requesting the scheduling of a telephonic status conference in the above-captioned matters. In support of its Motion, the City respectfully states as follows:

1. This consolidated proceeding concerns separate formal complaints filed with the Pennsylvania Public Utility Commission (“Commission”) by the City and Centre Park Historic District against UGI Utilities, Inc. (“UGI”) concerning, *inter alia*, the placement of gas meters in historic districts and other locations within the City.

2. Presently, direct testimony for both parties is due on or before April 23, 2018, and evidentiary hearings are scheduled to be held on May 15-17, 2018 in Harrisburg.¹

¹ Second Interim Order (February 15, 2018) at 3.

3. On April 4, 2018, the undersigned counsel entered their appearances on behalf of the City after being engaged to represent the City in this proceeding.

4. Given the complexity of this case and the extensive record that has been developed to date, the City believes a continuance of the testimony and hearing dates is advisable, so as to permit the undersigned sufficient time for file review and testimony and hearing preparation and also to afford the parties additional time to engage in good faith negotiations in an effort to possibly settle the matter without the need for further litigation.

5. The undersigned recently contacted counsel for UGI and engaged in discussions for the purpose of seeking an agreement on a revised procedural schedule to present to the presiding ALJ and to explore the matter of a possible settlement of the proceeding. Based on those discussions, the parties have tentatively agreed to the following:

- a. Currently scheduled testimony and hearing dates would be suspended.
- b. In addition to settlement discussions to be held telephonically and possibly in person, the parties would hold a formal settlement conference on May 16, 2018 at City Hall in Reading, with the parties expected to have in attendance persons who have the ability to make substantive decisions.
- c. Within five (5) business days of the settlement conference, the parties would provide a short status report to the presiding ALJ on the progress made at the settlement conference and whether a full or partial settlement appeared to be likely.
- d. The City's Direct Testimony would be due on June 29, 2018.
- e. UGI's responsive testimony would be due on July 27, 2018.
- f. Evidentiary hearings would be scheduled at the convenience of the presiding ALJ during the final two weeks of August, with briefing schedules to be agreed upon at the close of hearings.

6. In light of the foregoing agreement, the City believes it would be prudent to convene a telephonic status conference as quickly as possible to formalize the agreed-upon

schedule changes and commitments and discuss other matters related to this Motion.

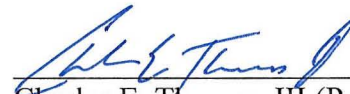
7. The parties propose the telephonic status conference be scheduled for 10 A.M. on one of the following mutually available dates: April 18, 19, 23 or 30, 2018.

8. The City submits that no party will be prejudiced by the granting of a continuance. Moreover, temporarily suspending the litigation schedule will allow the parties and the Commission to preserve limited resources while the parties engage in good faith settlement negotiations.

9. The City has contacted counsel for UGI to discuss all matters addressed in this Motion, and counsel for UGI advises that it concurs with the continuance request and proposed schedule changes and that it is available on the dates and times proposed in Paragraph 7 for a telephonic status conference.

WHEREFORE, the City of Reading respectfully requests that Administrative Law Judge Mary D. Long and this Honorable Commission grant this Motion, continue the litigation schedule for this proceeding as set forth above, and schedule a further telephonic status conference forthwith.

Respectfully submitted,



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Attorneys for City of Reading

DATED: April 17, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of April, 2018, served a true and correct copy of the foregoing document, upon the upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

Via Email and First Class Mail

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