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December 21, 2018

Via Email & First Class Mail

Honorable Mary D. Long Administrative Law Judge Pennsylvania Public Utility Commission Piatt Place 301 5th Avenue, Suite 220 Pittsburgh, PA 15222

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 Judge Long:

As Your Honor and the parties are aware, we are counsel to the City of Reading in the above consolidated proceedings. The matter of UGI's customer notification letter concerning the relocation of meters from inside to outside is an issue in the proceeding and was addressed on pages 33-35 of UGI's Responsive Brief and in Pages 14-16 of the City's Reply Brief. We have become aware of use by UGI of a customer notification letter which differs from assertions made by UGI in its brief concerning the revised customer notification letter it was supposedly using.

In footnote 46 on page 15 of its Reply Brief dated December 7, 2018, the City indicated that recent correspondence received by Reading customers suggested that UGI was reverting to its pre-October 2017 notification.

The attached letter in both English and Spanish, dated December 20, 2018, was received by the listed customers in the Heights Conservation District. The letter is contrary to UGI Exhibit 16 which supposedly contained UGI's "current" notification letter, and to the testimony of UGI witness Brown (Tr. 344-46). The English version of the letter expressly states "If your meter and regulator are inside, we will have to move them outside, due to company policy." The Spanish version also references company policy which the City understood had been eliminated from Company notices.

The City respectfully requests that the English and Spanish versions of the letter and the list of customer recipients be admitted into the record as City of Reading Late Filed Exhibit 1. If Your Honor would prefer, the City is prepared to formally petition the Commission to have the Interim Order of December 11, 2018 amended, the record reopened and the letter and list admitted.

The City appreciates your consideration of this request.

Respectfully submitted,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, Jr.

**Enclosures** 

cc: Certificate of Service (w/encls.)

Rosemary Chiavetta, Secretary (letter and certificate of service only, via e-filing)

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this 21<sup>st</sup> day of December, 2018, served a true and correct copy of the foregoing letter, upon the upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

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