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November 21, 2011

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: Kathleen Moran-Roberto, et al. v. UGI Penn Natural Gas, Inc.
Docket Nos. C-2011-2251178, et al.**

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Memorandum of UGI Penn Natural Gas, Inc. in the above-referenced proceeding. Copies will be provided as indicated on the certificate of service.

Respectfully Submitted,

Anthony D. Kanagy

ADK/skr

Enclosures

cc: Certificate of Service
Honorable Ember Jandebour

CERTIFICATE OF SERVICE

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

VIA E-MAIL AND FIRST CLASS MAIL

Dianne E. Dusman
Jennedy S. Johnson
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Richard A. Kanaskie
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

VIA FIRST CLASS MAIL

John Calafut
68 Honesdale Road
Carbondale, PA 18407

Dolores Alar
158 North Lehigh Street
Shavertown, PA 18708

Jerome Fuhr
111 Windswept Road
Tunkhannock, PA 18657

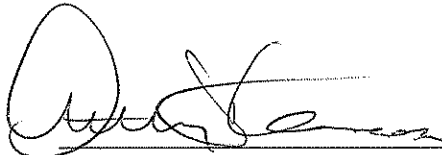
Charles E. Schulz
1114 Crystal Hill Road
Berwick, PA 18603

Daniel L. Pope
P.O. Box 208 Windswept Road
Tunkhannock, PA 18657

John Hennigan
527 Carverton Road
Wyoming, PA 18644

Kathleen Moran-Roberto
17 Shady Lane
Moosic, PA 18507-1135

Date: November 21, 2011


Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen Moran-Roberto,	:	Docket Nos. C-2011-2251178
John Calafut,	:	C-2011-2253878
Jerome Fuhr,	:	C-2011-2254311
Daniel L. Pope,	:	C-2011-2258722
John Hennigan	:	C-2011-2262771
Dolores Alar,	:	C-2011-2266076
Charles Schulz,	:	C-2011-2267370
Robert Rowlands,	:	C-2011-2272802
	:	
Complainants,	:	
	:	
v.	:	
	:	
UGI Penn Natural Gas, Inc.,	:	
	:	
Respondent.	:	

**PREHEARING MEMORANDUM OF
UGI PENN NATURAL GAS, INC.**

TO ADMINISTRATIVE LAW JUDGE EMBER S. JANDEBEUR:

UGI Penn Natural Gas, Inc., (“PNG” or the “Company”) hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

I. PROCEDURAL HISTORY

1. On July 12, 2011, PNG was served with a Formal Complaint filed by Kathleen Moran-Roberto at Docket No. C-2011-2251178. PNG filed an answer on August 9, 2011.

2. On July 26, 2011, PNG was served with a Formal Complaint filed by John Calafut at Docket No C-2011-2253878. PNG filed an answer on August 15, 2011.

3. On July 29, 2011, PNG was served with a Formal Complaint filed by Jerome Fuhr at Docket No. C-2011-2254311. PNG filed an answer on August 15, 2011.

4. On August 24, 2011, PNG was served with a Formal Complaint filed by Daniel L. Pope at Docket No C-2011-2258722. PNG filed an answer on September 13, 2011.

5. On October 6, 2011, PNG was served with a Formal Complaint filed by Dolores Alar at Docket No. C-2011-2266076. PNG filed an answer on October 26, 2011.

6. On October 14, 2011, PNG was served with a Formal Complaint filed by Charles Schulz at Docket No. C-2011-2267370. PNG filed an answer on November 3, 2011.

7. On October 18, PNG was served with a Formal Complaint filed by John Hennigan at Docket No. C-2011-2262771.¹ PNG filed an answer on November 3, 2011.

8. On November 14, 2011, PNG was served with a Formal Complaint filed by Robert Rowlands at Docket No. C-2011-2272802.

9. The Bureau of Investigation & Enforcement ("I&E") has entered a Notice of Appearance in all but one of the above described complaints. As of the date of this Prehearing Memorandum, I&E has not entered an appearance for the complaint filed by Robert Rowlands at Docket No. C-2011-2272802.

10. The Office of Consumer Advocate ("OCA") has filed Notices of Intervention and Public Statements in all but two of the above-described complaints. As of the date of this Prehearing Memorandum, the OCA has not intervened in the complaints filed by Charles Schulz at Docket No. C-2011-2267370 and Robert Rowlands at Docket No. C-2011-2272802.

11. On October 13, 2011, the OCA filed a Motion to Consolidate the above-described complaints. PNG did not object to the consolidation. OCA's Motion to Consolidate currently is pending before Administrative Law Judge Ember S. Jandebaur ("ALJ").

¹ Mr. Hennigan's Complaint was initially served on September 16, 2011. However, the Complaint was not sent to the correct address for PNG and, consequently, was re-served at the proper address on October 18, 2011.

12. On October 19, 2011, a Notice of Hearing in the above referenced matters was issued. The Initial Hearing was scheduled for November 28, 2011, at 10:00 a.m. before the ALJ.

13. On October 26, 2011, the OCA requested in an electronic communication to the ALJ that the Initial Hearing be converted to a Prehearing Conference, and that the Evidentiary Hearing be postpone until January 2012. PNG did not object to the postponement of the Evidentiary Hearing.

14. On November 19, 2011, the ALJ issued an electronic communication advising that the November 28, 2011 Initial Hearing will be a Prehearing Conference.

II. SERVICE OF DOCUMENTS

15. PNG requests that all documents be served on:

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PNG agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon:

Melanie Elatieh Elatiehm@ugicorp.com
David B. MacGregor dmacgregor@postschell.com
Christopher T. Wright cwright@postschell.com

16. PNG's attorneys are authorized to accept service on behalf of the Company in this proceeding. PNG requests that the Pennsylvania Public Utility Commission ("Commission") and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys in Harrisburg, Pennsylvania.

III. WITNESSES AND ISSUES

17. PNG anticipates offering testimony from the following witness on the following subject matters:

<u>Witnesses</u>	<u>Subjects</u>
David E. Lahoff Manager of Rates for UGI Utilities, Inc. 2525 N. 12th Street, Suite 360, Reading, Pennsylvania 19612 Tel: (610) 796-3520	<ul style="list-style-type: none">- Explain the background of PNG's Gas Beyond the Mains ("GBM") Program.- Explain the phase-in to market-based propane rates adopted in the 2011 PGC Proceeding.- Explain PNG's main extension tariff provisions.- Describe the costs associated with extending mains under PNG's main extension tariff provisions to provide natural gas service to the Complainants.- Address other GBM issues raised by Complainants, I&E, and OCA.

18. PNG reserves the right to call additional witnesses and/or present testimony on additional issues and subject matters that may arise during the course of the proceeding.

IV. DISCOVERY

19. The Company does not propose any special orders regarding discovery.

V. LITIGATION SCHEDULE

20. PNG notes that, as of the date of this Prehearing Memorandum, the parties have not yet agreed a litigation schedule.

21. To the extent that parties intend to present expert testimony, the litigation schedule adopted in this proceeding should provide for such testimony to be submitted in advance of the evidentiary hearing.

22. PNG will continue to work with the Presiding Officer and other parties to develop a mutually acceptable schedule.

23. PNG is not aware of any substantial public interest being expressed that would warrant the scheduling of a public input hearing.

VI. PROTECTION OF CONFIDENTIAL INFORMATION

24. If necessary and should the case proceed to hearing, PNG will timely submit an appropriate Motion for Protective Order.

VII. SETTLEMENT DISCUSSIONS

25. PNG is open and available for settlement discussions with the other parties.

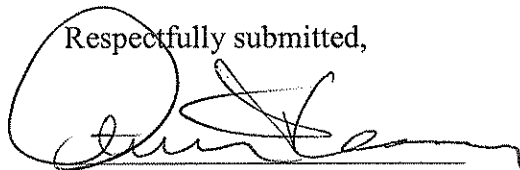
Mark C. Morrow (ID # 33590)
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Of Counsel:

Post & Schell, P.C.

Dated: November 21, 2011

Respectfully submitted,



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