

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETER HART	:	
	:	
v.	:	Docket No. C-2016-2523640
	:	
UGI UTILITIES, INC. – GAS DIVISION	:	

PREHEARING MEMORANDUM OF PETER HART

BEFORE ADMINISTRATIVE LAW JUDGE MARY D. LONG:

I. ISSUES

Did UGI fail to give reasonable consideration to placement of the meter inside the structure as required under 52 Pa. Code § 59.18d(1)(ii)(B) when Mr. Hart’s property is eligible to be listed in the National Register of Historic Places and such eligibility can be readily confirmed by UGI?

II. WITNESSES

- a) Peter Hart – Complainant and Property Owner – regarding all communication with UGI agents showing that UGI failed to give any consideration to inside meter placement.
- b) Christopher R. Brown – UGI’s Director of Operation for the Southern Region – regarding actions showing that UGI failed to give any consideration to inside meter placement.
- c) Engineer for UGI who worked on Mr. Hart’s Property (identity unknown) – regarding actions showing that UGI failed to give any consideration to inside meter placement.
- d) Rebuttal witnesses as needed

SMITH LAW GROUP, LLC

Dated: 2/11/16

By: /s/ David W. Crossett
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Counsel for Peter Hart

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CERTIFICATE OF SERVICE

I, David W. Crossett, Esq., certify that on the 11th day of February, 2016, I served a true and correct copy of the within Prehearing Memorandum addressed as follows in the following manner:

Mary D. Long
Administrative Law Judge
Pennsylvania Public Utility Commission
Via email: malong@pa.gov

Mark C. Morrow, Esq.
Danielle Jouenne, Esq.
460 North Gulph Road
King of Prussia, PA 19406
Via e-service and mail

SMITH LAW GROUP, LLC

Dated: 2/11/16

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