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File #: 165082

March 29, 2016

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 Prehearing Conference Memorandum of UGI Utilities, Inc. for the above-referenced proceedings. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'DR', with a long horizontal flourish extending to the right.

Devin Ryan

DTR/jl
Enclosures

cc: Honorable Mary D. Long
Certificate of Service

CERTIFICATE OF SERVICE
(Docket No. 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

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Date: March 29, 2016



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.	:	

**PREHEARING CONFERENCE MEMORANDUM OF
UGI UTILITIES, INC.**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to 52 Pa. Code § 5.222(d), UGI Utilities, Inc. (“UGI” or the “Company”) hereby submits this Prehearing Conference Memorandum.

I. BACKGROUND

On November 25, 2015, the Centre Park Historic District, Inc. (“CPHD”) filed a Formal Complaint at Docket No. C-2015-2516051 alleging that UGI’s meter location practices in the historic districts of Reading, PA violated the Commission’s regulations.

On December 15, 2015, UGI filed an Answer to CPHD’s Complaint denying that the Company committed any regulatory violation.

On February 11, 2016, a prehearing conference was held before the Honorable Mary D. Long (the “ALJ”) regarding CPHD’s Complaint and three other customer complaints about UGI’s meter placement decisions. At the prehearing conference, counsel for CPHD indicated that he would also be filing a complaint on behalf of the City of Reading (“City”) about UGI’s

meter location practices in Reading, PA and requested that CPHD's Complaint be consolidated with the City's forthcoming Complaint.

On February 16, 2016, the ALJ issued the First Prehearing Order that, among other things, scheduled a further telephonic prehearing conference for March 30, 2016.

On February 23, 2016, UGI received e-service of the City's Complaint. In its Complaint, the City generally alleged that UGI violated 52 Pa. Code § 59.18(d)(1) by failing to "consider" inside meter locations for historic buildings and for buildings in historic districts in Reading, PA. Moreover, the City contended that UGI's exterior meter location practices have created unsafe conditions.

On March 1, 2016, a Notice was issued scheduling the further telephonic prehearing conference for March 30, 2016.

On March 14, 2016, UGI filed an Answer denying the material allegations in the City's Complaint and averring that its meter location practices have been consistent with the Commission's regulations. Additionally, the Company filed Preliminary Objections, which argued that the City's Complaint should be dismissed in its entirety due to the legal insufficiency of the City's requested relief.

On March 24, 2016, the City filed an Answer to UGI's Preliminary Objections.

II. SERVICE OF DOCUMENTS

UGI's attorneys in this proceeding are Mark C. Morrow, Esquire, Danielle Jouenne, Esquire, David B. MacGregor, Esquire, and Devin T. Ryan, Esquire. UGI requests that Devin T. Ryan be listed as the recipient for service. Mr. Ryan's contact information is provided below:

Devin T. Ryan (ID # 316602)
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Phone: 717-612-6052
Fax: 717-731-1985
E-mail: dryan@postschell.com

UGI also requests that Mr. Morrow, Ms. Jouenne, and Mr. MacGregor be added to any informal e-mail distribution lists in this proceeding. Mr. Morrow's e-mail address is morrowm@ugicorp.com, Ms. Jouenne's e-mail address is jouenned@ugicorp.com, and Mr. MacGregor's e-mail address is dmacgregor@postschell.com. In addition, UGI agrees to receive service of documents electronically in this proceeding.

III. ISSUES

UGI believes the presently identified issues are:

1. Whether UGI has failed to "consider" inside meter locations for historic buildings and for buildings in historic districts in violation of 52 Pa. Code 59.18(d)(1).
2. When selecting outside meter locations, whether the Company "consider[ed] potential damage by outside forces," located gas meters in "protected location[s] adjacent to the building served," and protected those meters from "vehicular damage that may be anticipated." *See* 52 Pa. Code § 59.18(a)(5),(b)(1); 49 C.F.R. § 192.353 (adopted by the Commission in 52 Pa. Code § 59.33(b)).
3. Whether the City's requested relief is beyond the scope of this proceeding and, if not, whether it is reasonable.

IV. WITNESS AND AREA OF TESTIMONY

UGI's intended witness and a description of his testimony is provided below:

Witness

Hans G. Bell
Vice President – Engineering &
Operations Support
UGI Utilities, Inc.
2525 N. 12th Street, Suite 360
Reading, PA 19612
610-796-3450

General Subject Matter

Meter Location Decisions in
Reading, PA; Safety
Considerations in UGI’s Meter
Location Practices

Mr. Bell’s testimony will fully support the Company’s meter location decisions in Reading, PA and demonstrate that UGI has complied with the Commission’s regulations. UGI reserves the right to call additional witnesses, as necessary, to address other issues that may arise during the course of this proceeding. Furthermore, given the complex issues involved, the Company requests that the parties submit written testimony in this proceeding.

V. PROCEDURAL SCHEDULE

UGI notes that its Preliminary Objections, which seek to dismiss the City’s Complaint in its entirety, are still pending before the ALJ. Accordingly, the Company respectfully requests that establishing a litigation schedule be deferred until there is a ruling on its Preliminary Objections. In the event that this request is denied, UGI proposes the following procedural schedule:

June 2, 2016	Complainants’ Direct Testimony
August 9, 2016	Respondent’s Direct Testimony
September 7, 2016	Evidentiary Hearing

VI. DISCOVERY

UGI proposes no modifications to the Commission’s discovery rules. The Company is willing to work with the parties, through informal discovery, to expedite any additional discovery.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

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

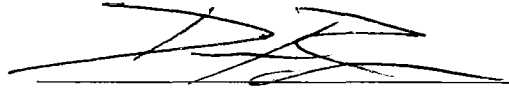
VIII. SETTLEMENT

UGI is willing to work with the parties to resolve this proceeding through settlement. Further, UGI would be willing to enter into a partial settlement, stipulate to certain facts, or both, in order to narrow the issues in this proceeding.

IX. CONSOLIDATION

UGI supports the City's request to consolidate the CPHD Complaint proceeding at Docket No. C-2015-2516051 with the City Complaint proceeding at Docket No. C-2016-2530475. In addition, the Company recognizes that at the prehearing conference on February 11, 2016, the Formal Complaint filed by Peter Hart at Docket No. C-2015-2523640 was not consolidated with the CPHD Complaint proceeding. However, UGI believes that the Hart Complaint proceeding should be consolidated with the City Complaint proceeding because Mr. Hart and the City have raised overlapping issues concerning UGI's meter location practices. Therefore, UGI will file a Motion to Consolidate these two proceedings and serve that Motion on all parties at Docket Nos. C-2015-2523640 and C-2016-2530475.

Respectfully submitted,



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Date: March 29, 2016

Attorneys for UGI Utilities, Inc.