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Devin Ryan

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File #: 165082

August 16, 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 Motion of UGI Utilities, Inc. to Compel Responses to Discovery Propounded on the City of Reading and Centre Park Historic District – Set I, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl  
Enclosures

cc: Honorable Mary D. Long  
Certificate of Service

**CERTIFICATE OF SERVICE**  
**(Docket Nos. C-2015-2516051 and 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**

Michael J. Savona, Esquire  
Michael E. Peters, Esquire  
Zachary A. Sivertsen, Esquire  
Eastburn and Gray, P.C.  
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Adam Young, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Date: August 16, 2016

  
Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Centre Park Historic District	:	
	:	
v.	:	Docket No. C-2015-2516051
	:	
UGI Utilities, Inc.	:	
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City of Reading	:	
	:	
v.	:	Docket No. C-2016-2530475
	:	
UGI Utilities, Inc.	:	

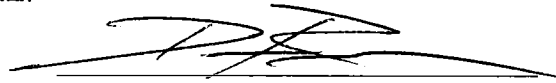
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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Danielle Jouenne (ID # 306829)  
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Date: August 16, 2016

Attorneys for UGI Utilities, Inc.

**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.	:	

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**MOTION OF UGI UTILITIES, INC. TO COMPEL RESPONSES TO  
DISCOVERY PROPOUNDED ON THE  
CITY OF READING AND CENTRE PARK HISTORIC DISTRICT – SET I**

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TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to 52 Pa. Code § 5.342(g), UGI Utilities, Inc. (“UGI” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on the City of Reading (“City”) and Centre Park Historic District (“CPHD”) (collectively, “Complainants”) – Set I. In support of its Motion, UGI states as follows:

**I. INTRODUCTION**

1. On July 22, 2016, UGI served Interrogatories and Requests for Production of Documents on the City of Reading and Centre Park Historic District – Set I (“UGI to City & CPHD Set I”) by email and first class mail. A true and correct copy of UGI to City & CPHD Set I is attached hereto and marked as **Appendix A**.

2. The Complainants served no objections to UGI's Interrogatories and Requests for Production of Documents.

3. On August 8, 2016, counsel for UGI received a call from counsel for the Complainants regarding the status of answers to UGI to City & CPHD Set I. Counsel for the Complainants indicated that the Complainants intended to respond to the discovery by August 11, 2016, but that they were having difficulty in gathering information to answer subparts of one of the questions – UGI to City & CPHD-I-5(i)-(j). He stated that he would provide an update on August 12, 2016, or August 15, 2016, as to the status of that response. Counsel for UGI requested that any responses to discovery that were otherwise ready be provided in a timely fashion.

4. Counsel for UGI did not receive a call from the Complainants' counsel on the dates indicated to provide a status update on the outstanding discovery.

5. On August 15, 2016, counsel for UGI left voicemails for the Complainants' counsel to discuss the status of the discovery responses.

6. On August 16, 2016, counsel for the Complainants left a voicemail for UGI's counsel noting that the discovery responses were still not ready. Counsel for UGI, in turn, left a voicemail for the Complainants' counsel requesting to discuss the matter. UGI's counsel and the Complainants' counsel subsequently spoke, and during that conversation, the Complainants' counsel reiterated that the responses were not ready. He further stated that the Complainants would attempt to answer most of the responses by August 17, 2016, but that the answer to UGI to City & CPHD-I-5(i)-(j) would not be ready to serve. UGI's counsel later noted that UGI would file a Motion to Compel on August 16, 2016, to preserve its rights.

7. As of the filing of this Motion, no informal or formal responses to UGI to City & CPHD Set I have been received.

## **II. MOTION TO COMPEL**

8. UGI requests that the Administrative Law Judge Mary D. Long (the “ALJ”) direct the Complainants to answer all of the interrogatories set forth in UGI to City & CPHD Set I.

9. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

10. Answers to interrogatories are due within 20 days of the service date. 52 Pa. Code § 5.342(d).

11. Here, UGI served its first set of interrogatories on July 22, 2016. Consequently, answers to UGI to City & CPHD Set I were due August 11, 2016, and are now five days overdue.

12. Further, the Complainants never objected to any of the questions in UGI to City & CPHD Set I. As a result, the Complainants have waived any objections to UGI’s discovery, including that the interrogatories are overly burdensome.

13. In addition, considering the end date of discovery has been set as September 9, 2016, the Complainants’ failure to answer UGI’s discovery in a timely fashion has adversely affected the Company’s ability to review the discovery and propound any additional discovery based on those responses before the discovery deadline. Consequently, UGI respectfully

requests that the discovery deadline be extended by the number of days measured from August 11, 2016, until the Complainants answer all of the questions in UGI to City & CPHD Set I.

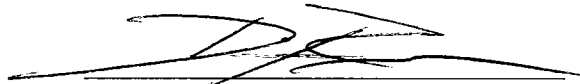
14. Finally, the Company has attempted to resolve any discovery disputes through informal processes in compliance with the ALJ's Third Prehearing Order issued June 15, 2016. As explained previously, counsel for UGI has reached out to the Complainants' counsel on multiple occasions to discuss the status of the discovery responses and requested that any responses that are ready be provided. To date, these efforts have produced no informal or formal responses to UGI's discovery.

15. For these reasons, UGI respectfully requests that the ALJ grant its Motion to Compel Responses to Discovery.

**IV. CONCLUSION**

For the reasons set forth above, UGI Utilities, Inc. respectfully requests that Administrative Law Judge Mary D. Long grant this Motion to Compel Responses to Discovery and direct the City of Reading and Centre Park Historic District to answer fully UGI to City & CPHD Set I, as described above within three (3) days from the date of the order, and to extend the discovery deadline by the number of days measured from August 11, 2016, until the Complainants answer all of the questions in UGI to City & CPHD Set I.

Respectfully submitted,



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Danielle Jouenne (ID # 306829)  
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Date: August 16, 2016

Attorneys for UGI Utilities, Inc.



## **APPENDIX A**

### **Interrogatories and Requests for Production of Documents Propounded by UGI Utilities, Inc. on the City of Reading and Centre Park Historic District – Set I**



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File #: 165082

July 22, 2016

***VIA E-MAIL & REGULAR MAIL***

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Michael E. Peters, Esquire  
Zachary A. Sivertsen, Esquire  
Eastburn and Gray, P.C.  
PO Box 1389  
Doylestown, PA 18901


**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 Counsel:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by UGI Utilities, Inc. on the City of Reading and Centre Park Historic District in the above-referenced proceedings.

Sincerely,



Devin Ryan

DTR/jl  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter Only*)  
Certificate of Service

**CERTIFICATE OF SERVICE**  
**(Docket Nos. C-2015-2516051 and 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**

Michael J. Savona, Esquire  
Michael E. Peters, Esquire  
Zachary A. Sivertsen, Esquire  
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mpeters@eastburngray.com  
zsivertsen@eastburngray.com

Date: July 22, 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.	:	

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED BY  
UGI UTILITIES, INC. ON THE CITY OF READING AND  
CENTRE PARK HISTORIC DISTRICT**

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Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, UGI Utilities, Inc. (“UGI Gas”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on the City of Reading (“City”) and Centre Park Historic District (“CPHD”) (collectively, “Complainants”) – Set I.

**INSTRUCTIONS AND DEFINITIONS**

1. The “Responding Party,” “you,” or “your” means the parties to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.

2. “Commission” means the Pennsylvania Public Utility Commission.

3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however

stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding

Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(f), these discovery requests are continuing and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. "City's Complaint" means the Formal Complaint filed by the City at Docket No. C-2016-2530475.

19. "CPHD's Complaint" means the Formal Complaint filed by CPHD at Docket No. C-2015-2516051.

20. "NGDC" means Natural Gas Distribution Company.



**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS ON THE CITY OF READING AND  
CENTRE PARK HISTORIC DISTRICT – SET I**

UGI to City & CPHD-I-1

Please provide all documents, correspondence, and communications in your possession that relate to the allegations in the City's Complaint and CPHD's Complaint (excluding references to mental impressions, conclusions, or opinions representing the value or merit of the claim or defense or respecting strategy or tactics and privileged communications from and to counsel).

UGI to City & CPHD-I-2

Please provide all documents, correspondence, and communications, concerning UGI's meter placement and relocation practices, between the City or CPHD and residents living in buildings whose meters are the subject of the City's Complaint and CPHD's Complaint.

UGI to City & CPHD-I-3

Please identify each person whom the City and CPHD plans to call as a witness in this proceeding and explain in detail the subject matter(s) on which the witness is expected to testify.

UGI to City & CPHD-I-4

Please provide copies of all exhibits you intend to present at the evidentiary hearings as part of your direct case in this proceeding. For each exhibit, please identify the witness who will be sponsoring the exhibit.

UGI to City & CPHD-I-5

Please identify each meter placement that the Complainants are contesting in this proceeding. For each meter placement, provide the following:

- (a) The address of the meter's building;
- (b) Whether the meter's building is listed as historic in the National Register of Historic Places or has been designated as historic under the Pennsylvania Historic District Act, the Pennsylvania Municipalities Planning Code, or a municipal home rule charter, and, if so, under which authorities the building has been listed or designated;
- (c) Whether the building is eligible to be listed in the National Register of Historic Places or designated as historic under the Pennsylvania Historic District Act, the Pennsylvania Municipalities Planning Code, or a

municipal home rule charter, and, if so, under which authorities the building would be eligible to be listed or designated;

- (d) Whether the meter's building is located in a historic district listed or eligible to be listed in the National Register of Historic Places and, if so, identify the district and explain whether it is listed or eligible to be listed;
- (e) Whether the meter's building is located in a locally designated historic district and, if so, which district;
- (f) Whether the meter's building is eligible to be listed as being located in a locally designated historic district and, if so, which district;
- (g) The statute(s), Commission regulation(s), or Commission order(s) that the Complainants believe the meter placement violates;
- (h) A detailed explanation of how the meter placement violates each statute, regulation, or order identified in subparagraph (g), including all facts relied upon by the Complainants in reaching that determination;
- (i) A statement as to whether the Complainants believe that the meter placement violates UGI's revised meter placement policy that was provided to counsel on April 24, 2016;
- (j) If the answer to subparagraph (i) is in the affirmative, a detailed explanation of how the meter placement violates UGI's revised meter placement policy, including all facts relied upon by the Complainants in reaching that determination; and
- (k) Copies of any photographs taken by the Complainants of the exterior meter placement, as well as the name, occupation, and employer of the person who took the photograph and the date on which the photograph was taken.

UGI to City & CPHD-I-6

Please reference Paragraph 26 of the City's Complaint. Please identify all "areas beyond the boundaries of these districts where the inside placement of gas meters must be considered because they are eligible for national registration."

UGI to City & CPHD-I-7

Please reference Paragraph 37 and Exhibit “G” of the City’s Complaint. Please state whether the City approved all of the permit applications referenced in Paragraph 37 and Exhibit “G.” If the answer is anything but an unqualified “Yes,” please identify each permit application that the City denied and state the reasons for the denial.

UGI to City & CPHD-I-8

Please reference Paragraph 39 of the City’s Complaint. Please provide copies of all written communications to City officials and residents in which “UGI officials and representatives have stated . . . that it has no intention of considering the inside placement of meters in *any* historic districts.”

UGI to City & CPHD-I-9

Please reference Paragraph 39(b) of the City’s Complaint. Please identify all “City officials” that attended the referenced meeting on October 23, 2015.

UGI to City & CPHD-I-10

Please reference Paragraph 39(d) of the City’s Complaint. Please identify all “City personnel” that attended the referenced tour on January 15, 2016.

UGI to City & CPHD-I-11

- (a) Please explain in detail whether the Complainants recognize that under general ratemaking principles, the costs to relocate exterior meters to the inside of buildings are passed on to UGI’s ratepayers.
- (b) Please state whether the City, CPHD, or both have conducted or commissioned any study, analysis, or report on the cost to relocate all of the exterior meters to the inside of buildings that are the subject of the City’s and CPHD’s Complaints. If so, please provide copies of all such studies, analyses, and reports.

UGI to City & CPHD-I-12

Please reference Paragraph 40 of the City’s Complaint.

- (a) Please explain in detail how the exterior placement of meters “has significantly disrupted the historic nature and aesthetic value of the districts.”
- (b) Please explain in detail how the exterior placement of meters has “had an immediate, direct, and negative impact on the historical integrity of the neighborhoods.”

- (c) Please identify all neighborhoods and districts referenced in Paragraph 40 of the City's Complaint.
- (d) Please state whether the City, CPHD, or both have conducted or commissioned any study, analysis, or report on how the exterior placement of meters by UGI has affected the historic and/or aesthetic qualities of the neighborhoods and/or districts referenced in Paragraph 40. If so, please provide copies of any such studies, analyses, and reports.

UGI to City & CPHD-I-13

Please reference Paragraph 42 of the City's Complaint. Please provide copies of all documents, correspondence, and communications in your possession in which "UGI representatives . . . stated that part of the reason they will only consider the interior placement of meters in federally designated historic districts is because they were unable, or unwilling, to identify areas qualifying as locally designated historic districts."

UGI to City & CPHD-I-14

Please reference Paragraph 43 of the City's Complaint. Please explain where in the Commission's *Final Rulemaking Order* it states that a public utility must apply for a permit to relocate a meter in a designated historic district, providing the relevant page numbers and quoted passages.

UGI to City & CPHD-I-15

- (a) Please reference Paragraph 53(a) of the City's Complaint. To your knowledge, has the Commission established specific standards for any NGDCs in Pennsylvania to follow when relocating gas meters? If so, please identify each NGDC, explain in detail the specific standards for that NGDC, identify where such specific standards were established, and provide copies of all documents relied upon by you in developing your response.
- (b) Please reference Paragraph 53(a), (c), and (d) of the City's Complaint. To your knowledge, do any NGDCs in Pennsylvania currently have to relocate meters in designated historic districts that have been placed on the outside of buildings to inside locations, except where the NGDC establishes a greater safety risk than in similarly situated historic properties? If so, please identify each NGDC, identify where such a requirement was established, and provide copies of all documents relied upon by you in developing your response.
- (c) Please reference Paragraph 53(e) of the City's Complaint. To your knowledge, do any NGDCs in Pennsylvania currently have to "provide a valid statement of justification that states why an inside placement creates a greater safety risk than in all similarly situated historic properties"? If so, please identify each NGDC, identify where such a requirement was

established, and provide copies of all documents relied upon by you in developing your response.

- (d) Please reference Paragraph 53(f) of the City's Complaint. To your knowledge, do any NGDCs in Pennsylvania currently have to ensure that exterior meter placements "are unobtrusive and screened from view through the use of landscaping, fencing, and/or architectural building features"? If so, please identify each NGDC, identify where such a requirement was established, and provide copies of all documents relied upon by you in developing your response.
- (e) Please reference Paragraph 53(h) of the City's Complaint. To your knowledge, do any NGDCs in Pennsylvania currently have to "make every effort to locate exterior meters on building facades that are not visible from public rights-of-way in the historic district, or work with the property owner/occupant to find an alternative placement that maintains the historic nature and aesthetic value of the district"? If so, please identify each NGDC, identify where such a requirement was established, and provide copies of all documents relied upon by you in developing your response.
- (f) Please reference Paragraph 53(i) of the City's Complaint. To your knowledge, has the Commission established specific standards for any NGDCs in Pennsylvania to follow when locating gas meters that will be replaced in buildings located in designated historic districts? If so, please identify each NGDC, explain in detail the specific standards for that NGDC, identify where such specific standards were established, and provide copies of all documents relied upon by you in developing your response.
- (g) Please reference Paragraph 53(i) of the City's Complaint. To your knowledge, do any NGDCs in Pennsylvania currently have to place meters inside buildings in designated historic districts, except where the NGDC establishes a greater safety risk than in similarly situated historic properties? If so, please identify each NGDC, identify where such a requirement was established, and provide copies of all documents relied upon by you in developing your response.

UGI to City & CPHD-I-16

Please reference Paragraph 59 of the City's Complaint. Please provide the address of each meter referenced in Paragraph 59 of the City's Complaint that "ha[s] been placed in such a way that [it] interfere[s] with handicapped parking spaces" and explain in detail how each meter interferes with a handicapped parking space.

UGI to City & CPHD-I-17

Please reference Paragraph 60 of the City's Complaint.

- (a) To your knowledge, was the meter located at 1243 Oley Street, which was incorrectly identified as 1043 Oley Street in Paragraph 60 of the City's Complaint, struck by a vehicle prior to the March 18, 2014 incident? If your answer is anything but an unqualified "No," please explain your response in detail.
- (b) To your knowledge, was the meter located at 844 Nicolls Street, which was incorrectly identified as 847 Nicolls Street in Paragraph 60 of the City's Complaint, struck by a vehicle prior to the April 20, 2015 incident? If your answer is anything but an unqualified "No," please explain your response in detail.

#### UGI to City & CPHD-I-18

Please reference Paragraphs 61 and 62 of the City's Complaint. To your knowledge, have any pedestrians been injured by the "exterior gas meters" that allegedly have been placed "in close proximity to City streets and on narrow sidewalks"? If so, please provide copies of all documents, correspondence, and communications relied upon by you in your response.

#### UGI to City & CPHD-I-19

To your knowledge, how many residents in the City's historic districts or who live in historic buildings have complained to the City or CPHD about the exterior meter placements? Please provide copies of all documents, correspondence, and communications relied upon by you in your response.

#### UGI to City & CPHD-I-20

Please reference Paragraph 65 of the City's Complaint. To your knowledge, are any NGDCs in Pennsylvania subject to the meter location requirements proposed by the City in Paragraph 65? If so, please identify each NGDC, explain in detail where such requirements were established, and provide copies of all documents relied upon by you in developing your response.

#### UGI to City & CPHD-I-21

Please reference Paragraph 53 of the City's Complaint. Please confirm whether it remains the City's position that all of the standards and requirements proposed in Paragraph 53 be imposed on UGI, including that the Commission require: (1) UGI to relocate all exterior meters in designated historic districts to the inside of buildings, except where the utility establishes a greater safety risk than in similarly situated historic properties; and (2) all future meter replacements in designated historic districts to be located on the inside of buildings, except where the utility establishes a greater safety risk than in similarly situated historic properties. If the answer is anything but an unqualified "Yes," please explain your response in detail.

UGI to City & CPHD-I-22

Please reference Paragraph 65 of the City's Complaint. Please confirm whether it remains the City's position that all of the standards and requirements proposed in Paragraph 65 be imposed on UGI, including that the Commission require: (1) UGI to install gas meters on the inside of buildings where a building façade is within 15 feet or less of a City street and no parking lane separates the lane of travel from the sidewalk; and (2) UGI to relocate exterior meters that have been located within 15 feet or less of a City street and no parking lane separates the lane of travel from the sidewalk. If the answer is anything but an unqualified "Yes," please explain your response in detail.