

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**RESPONSE TO MOTION TO COMPEL FILED BY UGI UTILITIES, INC.
SEEKING TO DISMISS THE MOTION TO COMPEL ON THE BASIS OF MOOTNESS**

Pursuant to 52 Pa.Code § 5.342(g), Centre Park Historic District and the City of Reading (“Complainants”) file this response to the Motion to Compel of UGI Utilities, Inc., (“UGI”) seeking to dismiss UGI’s motion on the basis of mootness.

I. BACKGROUND

1. On July 22, 2016, UGI served Interrogatories and Requests for Production of Documents on Complainants.
2. On August 8, 2016, Counsel for Complainants contacted Counsel for UGI, updating Counsel for UGI on the status of Complainants’ efforts to respond to UGI’s discovery requests.
3. On August 16, 2016, Counsel for Complainants again contacted Counsel for UGI, indicating that responses to discovery would be provided on August 17, 2016.
4. Notwithstanding, UGI filed this Motion to Compel on August 16, 2016.
5. On August 17, 2016, Complainants produced responses to UGI’s discovery requests, including 2143 pages of documents.

6. Complainants reserved the right to supplement their discovery responses as necessary, and will supplement their discovery responses as additional information and/or documents become available to Complainants.

II. RESPONSE TO MOTION TO COMPEL

7. Complainants incorporate paragraphs 1 through 6 *supra* as if fully set forth herein.

8. Complainants have responded to UGI's discovery requests.

9. Complainants will supplement their discovery responses as required pursuant to 52 Pa.Code § 5.332.

10. UGI's Motion to Compel is moot.

WHEREFORE, Complainants respectfully request that Administrative Law Judge Mary D. Long dismiss UGI's Motion to Compel as moot.

EASTBURN AND GRAY, P.C.

/s/ Michael E. Peters

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Dated: August 22, 2016

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: :
vs. : Docket No. C-2015-2516051
: :
UGI UTILITIES, INC. :

City of Reading, :
: :
v. : Docket No. C-2016-2530475
: :
UGI Utilities, Inc. :

CERTIFICATE OF SERVICE

It is hereby certified that on August 22, 2016, Michael E. Peters, Esquire served, by electronic mail a true and correct copy of the foregoing prehearing memorandum on the following:

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By:

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