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July 26, 2017

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 Answer of UGI Utilities, Inc. to the Complainants' Motion for Partial Summary Judgment in the above-referenced proceedings. 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

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Harrisburg, PA 17105-3265

Date: July 26, 2017



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.	:	

**ANSWER OF UGI UTILITIES, INC.
TO THE COMPLAINANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to 52 Pa. Code §§ 5.61 and 5.102, UGI Utilities, Inc. (“UGI” or the “Company”) hereby files this Answer to the Motion for Partial Summary Judgment filed by Centre Park Historic District (“CPHD”) and the City of Reading (“City”) (collectively, “Complainants”).¹ In the Motion, the Complainants allege that there is no material dispute of fact and they therefore are entitled to judgment as a matter of law with respect to the following:

(1) UGI violated 52 Pa. Code § 59.18(a)(8)(i) with respect to 189² properties for allegedly

¹ The Complainants also submitted a “Brief in Support” of their Motion. UGI notes that the Commission’s regulations do not provide for the filing of a supporting brief with a Motion for Summary Judgment. Accordingly, the Complainants’ Brief in Support is procedurally improper and should be stricken or otherwise disregarded.

² Throughout their Motion, the Complainants argue that they are entitled to summary judgment with respect to 289 meters as being in violation of Section 59.18(a)(8)(i). (See Motion ¶ 15(i) and Section III.A) In contrast, Exhibit 1 accompanying the Motion identifies 189 meter locations, and Exhibit A-1 even provides photographs for a meter location that is not listed in Exhibit 1 – 614 Eisenbrown Street. For purposes of this Answer, UGI assumes that 189 meters identified in Motion Exhibit 1 are the subject of this part of the Motion. Notwithstanding, the Complainants fail to provide photographs for all of these 189 meter locations in their Motion. Exhibit A-1 only identifies and provides photographs for 174 of those 189 meter locations. For any meters that the Complainants fail

installing meters “beneath or in front of windows or other buildings openings that may directly obstruct emergency fire exits” (“Count 1”); (2) UGI violated 52 Pa. Code § 59.18(a)(8)(v) with respect to 10³ locations for allegedly installing meters “[n]ear building air intakes under local or State building codes” (“Count 2”); and (3) UGI violated 52 Pa. Code § 59.18(a)(8)(vi) with respect to 14⁴ properties for allegedly installing meters “[i]n contact with soil or other potentially corrosive materials” (“Count 3”). (City and CPHD Motion ¶¶ 16-30) As explained in more detail below, Administrative Law Judge Mary D. Long (the “ALJ”) should deny the Complainants’ Motion in its entirety.

The Complainants’ Motion is frivolous and rife with errors and inconsistencies. First, the Complainants fail to recognize that the amended Section 59.18 became effective on September 13, 2014, and only applied prospectively. *See* 52 Pa. Code § 59.18(g)(1)-(2). The Complainants have stipulated that most of the meters that are the subject of their Motion were installed before September 13, 2014. Specifically, 121 of the 189 meters subject to Count 1 of their Motion, 6 of the 10 meters subject to Count 2 of their Motion, and 12 of the 14 meters subject to Count 3 of their Motion all were installed before amended Section 59.18 became effective. Therefore, as a matter of law, the Complainants’ claim that UGI violated amended 59.18 with respect to those meter installations cannot be sustained.

to identify or provide photographs for in their Motion, the Complainants have clearly failed to meet their burden as the moving party with respect to those meters.

³ As explained below, the Complainants are inconsistent in their Motion and Exhibits as to whether 10 or 17 meter locations are the subject of this part of their Motion. Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to the remaining 7 meters. Therefore, for purposes of this Answer, UGI assumes that 10 meter locations are the subject of this part of the Motion, because: (1) it is the number most consistently used; and (2) the Complainants did not provide photographs or list the 7 other properties in their Exhibits.

⁴ The Complainants identify 14 meter locations in their Motion and Exhibit 3. However, Exhibit A-3 accompanying the Motion, which is supposed to contain photographs of the properties, only provides photographs for 9 properties. The following 5 addresses are missing from Exhibit A-3: (1) 454 Douglass Street; (2) 947 N 5th Street; (3) 1034 N 5th Street; (4) 1037 N 5th Street; and (5) 1041 N 5th Street. Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to these 5 meters.

Second, the Complainants' claim that 189 meters were installed beneath or in front of windows or other buildings openings that may directly obstruct emergency fire exit ignores the fact that the Complainants have conceded that 163 of those meters were not under an opening that could be used as a fire exit.⁵ Section 59.18(a)(8)(i) specifically provides that a gas utility cannot install a meter "beneath or in front of windows or other buildings openings that may directly obstruct emergency fire exits." 52 Pa. Code § 59.18(a)(8)(i). Therefore, the Complainants cannot establish a claim that these 163 meters violate Section 59.18(a)(8)(i) as alleged.

Third, the Complainants incorrectly assert that there is no genuine issue of material fact with respect to the meters identified in their Motion. UGI never stipulated to the Complainants' photographs or allegations that any of these meters are located under windows, near building air intakes, or in contact with soil or other potentially corrosive materials. Although the Complainants provided photographs of these meter locations, there remain several material factual issues that have not been established or stipulated.

For example, many photographs allegedly supporting Count 1 of the Motion show that the meter is off to the side of the window or that the window is boarded up, covered in bars, or otherwise incapable of opening. Further, it has not been established or stipulated whether these window are (i) an emergency fire exit and (ii) are directly obstructed. These are all factual determinations that have not been and will need to be established in order to support the Complainants' claim that these meters violate 52 Pa. Code § 59.18(a)(8)(i).

⁵ See Section III.A., *infra*. UGI also notes that the 163 and 189 figures do not include 614 Eisenbrown Street. Although the Complainants included photographs for 614 Eisenbrown Street in Motion Exhibit A-1, they have omitted 614 Eisenbrown Street from the list of properties in Exhibit 1. For reference, the Complainants have conceded in their historic meter matrix that the meter located at 614 Eisenbrown Street is not located under an opening that could be used as a fire exit. (See Answer Exhibit 2)

Likewise, it is unclear from the photographs allegedly supporting Count 2 whether any of the exterior pipes or vents are actually air intakes. Indeed, there remains a factual question, which has not been established or stipulated, whether these exterior pipes or vents are air intakes and not exhaust vents or exterior plumbing. Further, it has not been established or stipulated whether the air intakes were present when the meters were initially installed, or whether the customer subsequently installed an air intake after the installation. These are all factual determinations that have not been and will need to be established in order to support the Complainants' claim that these meters violate 52 Pa. Code § 59.18(a)(8)(v).

Additionally, certain photographs allegedly supporting Count 3 have obstructed views or were taken too far away to tell if the meter is in contact with the ground. Moreover, it has not been established or stipulated whether any of these meters were initially installed in contact with soil or other potentially corrosive materials, or whether any subsequent action by the customer caused dirt, debris, or mulch to make contact with the meter. These are all factual determinations that have not been and will need to be established in order to support the Complainants' claim that these meters violate 52 Pa. Code § 59.18(a)(8)(vi).

Fourth, the Complainants fail to consistently state what meters are subject to their Motion and to provide all of the referenced photographs. For Count 1, the Complainants' Motion mentions "[a]t least 289 properties" that are in violation, but Exhibit 1 accompanying the Motion only identifies 189.⁶ (*Compare* Motion ¶ 15(i) and Section III.A, *with* Motion Exhibits 1 and A-1) Moreover, the Complainants provide photographs for only 174 of those 189 properties in

⁶ The Complainants' Exhibit 1 lists 1649 N 10th Street twice, as the 114th and 118th properties. (*See* Motion Exhibit 1) UGI assumes that the Complainants are referring to 1649 N 10th Street and 1649 ½ N 10th Street.

Exhibit A-1.⁷ In Count 2 of the Motion, the Complainants conflictingly state that “[a]t least 10 properties” and “[a]t least 17 properties” have meters near building air intakes, while the accompanying Exhibits identify 10 properties. (*Compare* Motion ¶¶ 15(ii), 23 and Section III.B, *with* Motion Exhibits 1 and A-1) For Count 3, the Motion mentions 14 properties, but the Complainants only provide photographs of 9 properties in Exhibit A-3. (*Compare* Motion ¶ 15(iii), 28 and Section III.C, *with* Motion Exhibit A-3) Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to the meters not identified and supported by the Exhibits attached to their Motion. To the extent that the Complainants’ errors omitted certain properties they intended to include in their Motion, they are not entitled to summary judgment with respect to those meters.

Finally, UGI notes that the Complainants’ Exhibits do not follow the order of meter addresses set forth in the Complainants’ meter matrices. As directed by the ALJ, the Complainants and UGI previously prepared detailed meter matrices for meters located in historic and non-historic districts. The Complainants prepared the initial matrices and established the order and presentation of the meters. The parties, as well as Your Honor, have been using and relying on these meter matrices as a basis to identify the alleged meter locations the Complainants seek to challenge. The Exhibits to Complainants’ Motion, however, do not follow the same order and presentation established in the meter matrices and combine both historic and

⁷ The Complainants fail to provide photographs for the following 15 addresses that are listed in Exhibit 1: (1) 647 Bingaman Street; (2) 514 Chestnut Street; (3) 517 Laurel Street; (4) 527 Laurel Street; (5) 517 Minor Street; (6) 419 Oley Street; (7) 310 N 5th Street; (8) 319 N 5th Street; (9) 321 N 5th Street; (10) 323 N 5th Street; (11) 331 N 5th Street; (12) 336 N 5th Street; (13) 417 S 5th Street; (14) 614 S 7th Street; (15) 434 Spring Street. (*Compare* Motion Exhibit 1, *with* Motion Exhibit A-1) Further, as explained in footnote 2, *supra*, Exhibit A-1 contains photographs of 614 Eisenbrown Street, a meter location that is not listed in Exhibit 1.

non-historic addresses.⁸ In fact, the Complainants' own Exhibits attached to the Motion do not even have the same corresponding order (*e.g.*, the photographs in Exhibit A-1 do not follow the same order of properties in Exhibit 1). As such, it requires significant time and resources to review the Complainants' Exhibits and to match the meter locations identified in the Complainants' Exhibits to the previously-produced meter matrices. Although Complainants' bear the burden as the party requesting summary judgment, they apparently think that UGI and Your Honor should be required to incur the time and resources to review and analyze the Complainants' Exhibits and cross-check those Exhibits, including the photographs, against the meter matrices.

For these reasons, and as explained in more detail below, UGI respectfully requests that the ALJ deny the Complainants' Motion for Partial Summary Judgment in its entirety:

ANSWER

I. BACKGROUND AND PROCEDURAL HISTORY

1. Admitted.
2. Admitted.
3. Denied as stated. The City's Formal Complaint only alleged that: (1) UGI violated 52 Pa. Code § 59.18(d)(1) by relocating inside meters to outside locations in historic districts within the City of Reading (see City Complaint, Count I); and (2) UGI violated 52 Pa. Code § 59.18(a)(5),(b)(1) and 49 C.F.R. § 192.353 (adopted by 52 Pa. Code § 59.33) by installing exterior meters within the City of Reading that are unprotected from vehicular damage and other outside forces (*see* City Complaint, Count II). The City's Formal Complaint did not

⁸ It is entirely unclear to UGI why the previously-established order and presentation of the meter locations would not be followed other than to harass and put an undue burden on UGI in its efforts to respond to the Complainants' Motion.

allege that UGI violated any other provision of 52 Pa. Code § 59.18. By way of further response, UGI received e-service of the City’s Complaint on February 23, 2016.

4. Denied as stated. The City’s Formal Complaint only alleged that: (1) UGI violated 52 Pa. Code § 59.18(d)(1) by relocating inside meters to outside locations in historic districts within the City of Reading (*see* City Complaint, Count I); and (2) UGI violated 52 Pa. Code § 59.18(a)(5),(b)(1) and 49 C.F.R. § 192.353 (adopted by 52 Pa. Code § 59.33) by installing exterior meters within the City of Reading that are unprotected from vehicular damage and other outside forces (*see* City Complaint, Count II). Further, UGI maintains that the City did not seek “a determination regarding the breadth of Section 59.18’s requirements,” but rather requested relief that conflicted with and would rewrite the Commission’s regulations.

5. Admitted.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted. By way of further response, the Complainants served two spreadsheets: one for meter locations in historic districts and a second for meter locations in non-historic districts.

10. Admitted.

11. Admitted. By way of further response, on May 24, 2017, the Complainants failed to stipulate or object to UGI’s service line installation data, as required by the Eighth Prehearing Order. At the prehearing conference on June 15, 2017, the Complainants stipulated on the record to UGI’s service line installation data as the date of the meter relocation. (*See* Tr. 100-01)

12. Admitted in part and denied in part. It is admitted that discovery in this matter is closed and that certain issues are ready for disposition, namely the ones identified in UGI's Motion for Summary Judgment. To the extent that the Complainants' claims concerning the meters identified in the Complainants' Motion for Partial Summary Judgment are not otherwise summarily dismissed, it is denied that there is "no genuine issue of material fact in dispute" with respect to those meters. As explained in more detail below, UGI never stipulated that any of the identified meters were installed: (1) "beneath or in front of windows or other building openings that may directly obstruct emergency fire exits"; (2) "[n]ear building air intakes under local or State building codes"; or (3) "[i]n contact with soil or other potentially corrosive materials."

II. STANDARD OF REVIEW FOR SUMMARY JUDGMENT

13. Paragraph 13 is a conclusion of law to which no response is required, and the content of 52 Pa. Code § 5.102 speaks for itself. Any interpretation, characterization, or quotation thereof is denied.

14. Paragraph 14 is a conclusion of law to which no response is required.

15. Denied. It is denied that the Complainants are entitled to partial summary judgment that UGI has violated Section 59.18(a)(8)(i), (a)(8)(v), or (a)(8)(vi). Further, as explained in Paragraphs 20, 25, and 30 below, to the extent that claims about the disputed meters are not otherwise summarily dismissed, there is a dispute of material fact with respect to these meters. Therefore, the Complainants are not entitled to partial summary judgment.

III. THE COMPLAINANTS ARE NOT ENTITLED TO PARTIAL SUMMARY JUDGMENT

A. The Complainants Are Not Entitled To Summary Judgment With Respect To The Meters Allegedly Located Beneath Windows Or Other Openings That May Directly Obstruct Emergency Fire Exists

16. Paragraph 16 of the Complainants' Motion incorporates Paragraphs 1 through 15 of the Motion. Accordingly, no response is required.

17. Paragraph 17 is a conclusion of law to which no response is required, and the content of 52 Pa. Code § 59.18(a)(8)(i) speaks for itself. Any interpretation, characterization, or quotation thereof is denied.

18. Admitted in part and denied in part. It is denied that 289 meter locations are listed in Slifko Exhibit A and highlighted in green in the matrices and that photographs are contained in Section A-1 of Slifko Exhibit A. There are: (1) only 189 meter locations listed in Exhibit A and highlighted in green; and (2) photographs of only 174 of those 189 meter locations in Exhibit A-1. Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to the remaining unknown and unidentified 100 meters, as well as the 15 meters for which the Complainants have failed to provide photographs in Exhibit A-1. Further, it is denied that any of the identified meter installations violate Section 59.18(a)(8)(i).

19. Denied. For the reasons explained in Paragraph 20, to the extent that claims about the 189 meters are not summarily dismissed, there is a dispute as to material fact with respect to these meters. Further, it is denied that the photographs establish that UGI violated Section 59.18(a)(8)(i), as explained in Paragraph 20 below.

20. Admitted in part and denied in part. It is admitted that Exhibit 1 attached to the Complainants' Motion lists 189 properties as being at issue. It is denied that the Complainants

are entitled to partial summary judgment that the Company has violated 52 Pa. Code § 59.18(a)(8)(i). In further response, UGI states as follows:

First, of the 189 meters that allegedly violate Section 59.18(a)(8)(i) by being installed “beneath or in front of windows or other building openings that may directly obstruct emergency fire exits,” the Complainants have stipulated that 121 of these meters have service line installation dates that pre-date September 13, 2014, which is when the amended Section 59.18 became effective. At the June 15, 2017 prehearing conference, the Complainants stipulated on-the-record to the service line installation data provided by UGI as the date of the meter relocation:

JUDGE LONG: Mr. Savona, the May 24, 2017 spreadsheet does not include a stipulation regarding the installation of the date of the service lines for the meter placements. Do the complainants intend to stipulate to those dates?

MR. SAVONA: Your Honor, we don't have any independent information. So, at this point, I have no issue with stipulating because the city simply does not maintain that information and there is no way I can contest it. So, in the interest of just moving it along, **we will stipulate to the dates supplied by UGI.**

(Tr. 100-101 (emphasis added)) Based on the Complainants' on-the-record stipulation, there is no genuine issue of material fact or dispute concerning when the meters were installed or relocated. Based on the stipulated data, 121 of these meters have service line installation dates that pre-date September 13, 2014, as shown in **Exhibits 1 through 3** attached to this Answer. Therefore, as a matter of law, UGI could not have violated Section 59.18(a)(8)(i) when installing those 121 meters.

Second, Section 59.18(a)(8)(i) prohibits locating meters under or in front of “windows or other building openings that may directly obstruct emergency fire exits.” 52 Pa. Code § 59.18(a)(8)(i). Accordingly, to establish that UGI violated amended Section

59.18(a)(8)(i), the Complainants must produce evidence that (1) the meter was installed under a window, (2) the window may be used as an emergency fire exit, and (3) that the meter obstructs the emergency fire exit. For 163 of the 189 meter locations, the Complainants conceded in their meter matrices that these meters are not “under an opening that could be a fire exit” as shown in Exhibit 1 to this Answer.⁹ Therefore, the Complainants are not entitled to partial summary judgment that these 163 meters violate Section 59.18(a)(8)(i).

Third, UGI never stipulated to the Complainants’ photographs or the fact that these meters are (1) installed under a window, (2) the window may be used as an emergency fire exit, or (3) that the meter obstructs the emergency fire exit. Many of the photographs clearly show that the meter is located off to the side of any windows or in front of the properties’ porches, several feet away from any first floor window.¹⁰ Further, even if the Complainants’ photographs show that a meter is located under a window, these pictures do not and cannot establish that the window may be used as an emergency fire exit or that the meter obstructs the

⁹ UGI further notes that 108 of these 163 meters were installed before September 13, 2014, based on the stipulated service line installation data.

¹⁰ See, e.g., 1307 N 13th Street (CityCPHD_02585-2586), 540 Schuylkill Avenue (CityCPHD_03290-3293), 634 Schuylkill Avenue (CityCPHD_03331-3334), 637 Schuylkill Avenue (CityCPHD_03319-3321), 718 Schuylkill Avenue (CityCPHD_03354), 724 Schuylkill Avenue (CityCPHD_03355-3357), 728 Schuylkill Avenue (CityCPHD_3360-3363), 818 Gordon Street (CityCPHD_03610-3612), 613 Eisenbrown Street (CityCPHD_03644-3645), 603 Eisenbrown Street (CityCPHD_03654-3655), 657 Clinton Street (CityCPHD_03669-3670), 127 W Windsor Street (CityCPHD_04184), 163 W Windsor Street (CityCPHD_04195), 154 W Windsor Street (CityCPHD_04199), 150 W Windsor Street (CityCPHD_04201), 148 W Windsor Street (CityCPHD_04202), 158 W Green Street (CityCPHD_04750-4752), 1617 Bern Street (CityCPHD_07055-7056), 107 Mulberry Street (CityCPHD_07326), 1664 N 10th Street (CityCPHD_04966), 1657 N 10th Street (CityCPHD_04994), 1663 N 10th Street (CityCPHD_04997), 1506 N 10th Street (CityCPHD_05010), 1504 N 10th Street (CityCPHD_05011), 1561 N 10th Street (CityCPHD_05028), 1420 N 10th Street (CityCPHD_05050), 1412 N 10th Street (CityCPHD_05054), 1453 N 10th Street (CityCPHD_05082), 1354 N 10th Street (CityCPHD_05087), 1242 N 10th Street (CityCPHD_05124), 1240 N 10th Street (CityCPHD_05125), 1208 N 10th Street (CityCPHD_05132), 1206 N 10th Street (CityCPHD_05133), 1205 N 10th Street (CityCPHD_05137-5138), 1207 N 10th Street (CityCPHD_05139), 1113 N 10th Street (CityCPHD_05183), 1155 N 10th Street (CityCPHD_05199), 1159 N 10th Street (CityCPHD_05200), 1058 N 10th Street (CityCPHD_05202), 1056 N 10th Street (CityCPHD_05203), 1050 N 10th Street (CityCPHD_05205), 1040 N 10th Street (CityCPHD_05208), 1018 N 10th Street (CityCPHD_05215), 1007 N 10th Street (CityCPHD_05225), 1011 N 10th Street (CityCPHD_05227), 805 N 10th Street (CityCPHD_05273), 516 N 10th Street (CityCPHD_05332), 1047 Cotton Street (CityCPHD_05368), 1259 Cotton Street (CityCPHD_05434), 1333 Cotton Street (CityCPHD_05489-5490), 110 S 4th Street (CityCPHD_05592), 116 S 4th Street (CityCPHD_05594).

emergency fire exit. Indeed, it is unclear from the photographs whether the windows are even operational, as several of the windows appear to be barred windows, boarded up windows, small basement windows, or large store front windows.¹¹ If windows cannot open, they clearly cannot be used as an emergency fire exit. Consequently, there is a genuine issue of material fact whether the 189 meters identified in the Complainants' Motion obstruct a window that may be used as an emergency fire exit as required to establish a violation of 52 Pa. Code § 59.18(a)(8)(i) and, therefore, Complainants' request for Summary Judgment must be denied.

Finally, the Complainants' Motion fails to provide photographs for all of these 189 properties. Exhibit A-1, which is supposed to provide photographs of these properties, only contains photographs for 174 of the 189 meter locations.¹² Accordingly, the Complainants have failed to meet their burden as the moving party with respect to the meters not identified and supported by the Exhibits attached to their Motion.

Attached hereto as **Exhibit 1** is an updated copy of the Complainants' list of the 189 meters (Exhibit 1 to the Motion) that allegedly violate 52 Pa. Code § 59.18(a)(8)(i), which states the following for each meter: (1) whether the meter is located in a historic district or a non-

¹¹ See, e.g., 1139 N 13th Street (CityCPHD_02545), 1307 N 13th Street (CityCPHD_02585-2586), 540 Schuylkill Avenue (CityCPHD_03290-3293), 718 Schuylkill Avenue (CityCPHD_03354), 724 Schuylkill Avenue (CityCPHD_03355-3357), 728 Schuylkill Avenue (CityCPHD_3360-3363), 818 Gordon Street (CityCPHD_03610-3612), 657 Clinton Street (CityCPHD_03669-3670), 154 W Windsor Street (CityCPHD_04199), 150 W Windsor Street (CityCPHD_04201), 148 W Windsor Street (CityCPHD_04202), 478 W Oley Street (CityCPHD_04343), 1568 N 10th Street (CityCPHD_04998), 1561 N 10th Street (CityCPHD_05028), 1357 N 10th Street (CityCPHD_05115), 1242 N 10th Street (CityCPHD_05124), 1240 N 10th Street (CityCPHD_05125), 1206 N 10th Street (CityCPHD_05133), 1204 N 10th Street (CityCPHD_05134), 1202 N 10th Street (CityCPHD_05135), 1205 N 10th Street (CityCPHD_05137-5138), 1207 N 10th Street (CityCPHD_05139), 1257 N 10th Street (CityCPHD_05157), 1113 N 10th Street (CityCPHD_05183), 1155 N 10th Street (CityCPHD_05199), 1159 N 10th Street (CityCPHD_05200), 1058 N 10th Street (CityCPHD_05202), 1056 N 10th Street (CityCPHD_05203), 1050 N 10th Street (CityCPHD_05205), 1040 N 10th Street (CityCPHD_05208), 1018 N 10th Street (CityCPHD_05215), 1001 N 10th Street (CityCPHD_05223), 1007 N 10th Street (CityCPHD_05225), 1011 N 10th Street (CityCPHD_05227), 916 N 10th Street (CityCPHD_05248), 900 N 10th Street (CityCPHD_05253), 848 N 10th Street (CityCPHD_05259), 516 N 10th Street (CityCPHD_05332), 1600 Cotton Street (CityCPHD_05530), 1817 Cotton Street (CityCPHD_05586), 200 S 4th Street (CityCPHD_05615), 202 S 4th Street (CityCPHD_05616), 252 S 4th Street (CityCPHD_05636), 303 S 4th Street (CityCPHD_05675).

¹² See footnotes 2 and 7, *supra*.

historic district; (2) whether the meter was installed before September 13, 2014; (3) whether the Complainants conceded that the meter was not located under a window that could be a fire exit; and (4) whether a dispute of material fact exists. Attached hereto as **Exhibits 2 and 3** are copies of the historic and non-historic district meter matrices that includes the following: (1) only the 189 meters identified by Complainants' Motion; (2) the service installation date; (3) whether UGI stipulated to the meter being located under a window; (4) whether the Complainants and UGI stipulated that the meter was located under an opening that could be a fire exit; and (5) a cross-reference to the item number of each meter on the Complainants' Exhibit 1 to their Motion (e.g., cross-reference 1.24 means No. 24 on Complainants' Exhibit 1).

WHEREFORE, UGI respectfully requests that the Complainants' request for Summary Judgment on its claim that 189 meters allegedly violate Section 59.18(a)(8)(i) by being installed beneath or in front of windows or other building openings that may directly obstruct emergency fire exits be denied.

B. The Complainants Are Not Entitled To Summary Judgment With Respect To The Meters Allegedly Located Near Building Air Intakes

21. Paragraph 21 of the Complainants' Motion incorporates Paragraphs 1 through 20 of the Motion. Accordingly, no response is required.

22. Paragraph 22 is a conclusion of law to which no response is required, and the content of 52 Pa. Code § 59.18(a)(8)(v) speaks for itself. Any interpretation, characterization, or quotation thereof is denied.

23. Admitted in part and denied in part. It is denied that Slifko Exhibit A lists and contains photographs of 17 meter locations. Although Slifko Exhibit A lists properties and contains photographs, only 10 meter locations are identified and accompanied by photographs.

Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to the remaining unknown and unidentified 7 meters. In any event, it is denied that any of the meter installations violate Section 59.18(a)(8)(v).

24. Admitted in part and denied in part. It is admitted that photographs are included in Section A-2 of Slifko Exhibit A and that 10 meters are highlighted in blue in the matrices. As explained in Paragraph 25, to the extent that claims about the 10 meters are not summarily dismissed, there is a dispute as to material fact with respect to these meters. Moreover, as detailed in Paragraph 25 below, it is denied that the photographs establish that UGI violated Section 59.18(a)(8)(v).

25. Admitted in part and denied in part. It is admitted that Exhibit 2 attached to the Complainants' Motion identifies 10 properties at issue. It is denied that the Complainants are entitled to partial summary judgment that the Company has violated 52 Pa. Code § 59.18(a)(8)(v) for installing meters "[n]ear building air intakes under local or State building codes." In further response, UGI states as follows:

First, the Complainants have stipulated that 6 of the 10 meters that allegedly violate Section 59.18(a)(8)(v) have service line installation dates that pre-date September 13, 2014, which is when the amended Section 59.18 became effective. As explained above in Paragraph 20, based on the Complainants' on-the-record stipulation, there is no genuine issue of material fact or dispute concerning when the meters were installed or relocated in the historic and non-historic districts. (*See* Tr. 100-01) Based on the stipulated data, 6 of these meters have service line installation dates that pre-date September 13, 2014, as shown in **Exhibits 4 through 6** attached to this Answer. Therefore, as a matter of law, UGI could not have violated Section 59.18(a)(8)(v) when installing those 6 meters.

Second, Section 59.18(a)(8)(v) provides that a gas utility cannot install meters “[n]ear building air intakes under local or State building codes.” 52 Pa. Code § 59.18(a)(8)(v). UGI never stipulated to the Complainants’ photographs or the fact that these meters are near building air intakes. Even if the Complainants’ photographs show polymerized vinyl chloride (“PVC”) or plastic pipes and vents, these pictures do not and cannot establish that these pipes and vents are air intakes. Indeed, it is entirely unknown and has not been demonstrated whether any of these pipes and vents are exhaust vents, exhaust pipes, or exterior plumbing -- none of which are air intakes. Moreover, even if they all are building air intakes, there remains a factual question what distance constitutes “near” such air intakes. Consequently, there is a genuine issue of material fact whether the 10 meters identified in the Complainants’ Motion are located near an air intake as required to establish a violation of 52 Pa. Code § 59.18(a)(8)(v).

Third, Section 59.18(a)(8)(v) prohibits the “installation” of a meter in contact with soil or other potentially corrosive materials. Consequently, a photograph allegedly showing an air intake in the vicinity of a meter does not, by itself, prove a violation of the regulation. For example, a customer could install an air intake nearby after UGI installed the meter. Therefore, there is a genuine issue of material fact whether these 10 meters were nearby air intakes at the time they were installed, as required to establish that UGI violated 52 Pa. Code § 59.18(a)(8)(v).

Attached hereto as **Exhibit 4** is an updated copy of the Complainants’ list of the 10 meters (Exhibit 2 to the Motion) that allegedly violate 52 Pa. Code § 59.18(a)(8)(v), which states the following for each meter: (1) whether the meter is located in a historic district or a non-historic district; (2) whether the meter was installed before September 13, 2014; and (3) whether a dispute of material fact exists. Attached hereto as **Exhibits 5 and 6** are copies of the historic and non-historic district meter matrices that includes the following: (1) only the 10

meters identified by Complainants' Motion; (2) the service installation date; (3) whether UGI stipulated that the meter is located near an air intake; and (4) a cross-reference to the item number of each meter on the Complainants' Exhibit 2 to their Motion (*e.g.*, cross-reference 2.4 means number 4 on Complainants' Exhibit 2).

WHEREFORE, UGI respectfully requests that the Complainants' request for Summary Judgment on its claim that 10 meters allegedly violate Section 59.18(a)(8)(v) by being installed near building air intakes be denied.

C. The Complainants Are Not Entitled To Summary Judgment With Respect To The Meters Allegedly Installed In Contact With Soil Or Other Potentially Corrosive Materials

26. Paragraph 26 of the Complainants' Motion incorporates Paragraphs 1 through 25 of the Motion. Accordingly, no response is required.

27. Paragraph 27 is a conclusion of law to which no response is required, and the content of 52 Pa. Code § 59.18(a)(8)(vi) speaks for itself. Any interpretation, characterization, or quotation thereof is denied.

28. Admitted in part and denied in part. It is admitted that Exhibit 3 attached to the Motion lists 14 properties at issue. However, it is denied that Slifko Exhibit A lists and contains photographs of those 14 properties, because Exhibit A-3 only identifies and provides photographs for 9 properties. Consequently, the Complainants have clearly failed to meet their burden as the moving party with respect to the 5 meters not supported by Slifko Exhibit A. In any event, it is denied that any of these meter installations violate Section 59.18(a)(8)(vi).

29. Admitted in part and denied in part. It is admitted that 14 meters are highlighted in beige in the matrices. However, it is denied that photographs of 14 properties are included in

Section A-3 of Slifko Exhibit A. As explained in Paragraph 30, to the extent that claims about the 14 meters are not summarily dismissed, it is denied that there are no material facts in dispute with respect to these 14 meters. Further, it is denied that the photographs establish that UGI violated Section 59.18(a)(8)(vi), for the reasons set forth in Paragraph 30 below.

30. Admitted in part and denied in part. It is admitted that Exhibit 3 attached to the Complainants' Motion lists the 14 properties at issue. It is denied that the Complainants are entitled to partial summary judgment on their claim that UGI violated 52 Pa. Code § 59.18(a)(8)(vi) for installing these 14 meters "[i]n contact with soil or other potentially corrosive materials." In further response, UGI states as follows:

First, the Complainants have stipulated that 12 of the 14 meters that allegedly violate Section 59.18(a)(8)(vi) have service line installation dates that pre-date September 13, 2014, which is when the amended Section 59.18 became effective. As explained above in Paragraph 20, based on the Complainants' on-the-record stipulation, there is no genuine issue of material fact or dispute concerning when the meters were installed or relocated in the historic and non-historic districts. (See Tr. 100-01) Based on the stipulated data, 12 of these meters have service line installation dates that pre-date September 13, 2014, as shown in **Exhibits 7 and 8** attached to this Answer. Therefore, as a matter of law, UGI could not have violated Section 59.18(a)(8)(vi) when installing those 12 meters.

Second, Section 59.18(a)(8)(vi) provides that a gas utility cannot install meters "[i]n contact with soil or other potentially corrosive materials." 52 Pa. Code § 59.18(a)(8)(v). UGI never stipulated to the Complainants' photographs or the fact that these meters were installed in contact with soil or other potentially corrosive materials. In many of the photographs, the view of the meter is obstructed or too far away to tell if the meter is in contact

with the ground.¹³ Further, one of the meters appears to be located above stones, *i.e.*, not soil or other potentially corrosive materials.¹⁴ Consequently, there is a genuine issue of material fact whether the 14 meters identified in the Complainants' Motion are located in contact with soil or other potentially corrosive materials as required to establish a violation of 52 Pa. Code § 59.18(a)(8)(vi).

Third, the regulation prohibits the "installation" of a meter in contact with soil or other potentially corrosive materials. A photograph that allegedly shows the presence of a meter in contact with the ground does not, by itself, prove a violation of the regulation. For example, a customer could place dirt, debris, mulch, or other materials in contact with a meter after UGI installed the meter. Thus, there is a genuine issue of material fact whether these 14 were in contact with soil or other potentially corrosive materials at the time they were installed, as required to establish that UGI violated 52 Pa. Code § 59.18(a)(8)(vi).

Finally, the Complainants' Motion fails to provide photographs of all 14 meter locations. Exhibit A-3 accompanying the Motion only contains photographs for 9 of these properties. Notably, Exhibit A-3 omits the two meters that were installed after September 13, 2014: 454 Douglass Street and 947 N 5th Street. Thus, the Complainants have failed to meet their burden as the moving party concerning the meters not identified and supported by the exhibits to their Motion.

Attached hereto as **Exhibit 7** is an updated copy of the Complainants' list of the 14 meters (Exhibit 3 to the Motion) that allegedly violate 52 Pa. Code § 59.18(a)(8)(vi), which states the following for each meter: (1) whether the meter is located in a historic district or a non-

¹³ See, e.g., 1102 Hampden Boulevard (CityCPHD_02523), 1516 N 15th Street (CityCPHD_02628-2629), 1316 N 14th Street (CityCPHD_02634), 1503 Palm Street (CityCPHD_02847-2848), 746 Gordon Street (CityCPHD_03591-3595).

¹⁴ See 1503 Palm Street (CityCPHD_02847-2848).

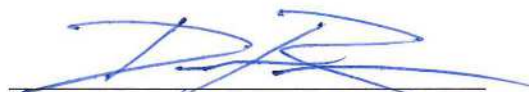
historic district; (2) whether the meter was installed before September 13, 2014; and (3) whether a dispute of material fact exists. Attached hereto as **Exhibit 8** is a copy of the historic district meter matrix that includes the following: (1) only the 14 meters identified by Complainants' Motion; (2) the service installation date; (3) whether UGI stipulated that the meter is located near an air intake; and (4) a cross-reference to the item number of each meter on the Complainants' Exhibit 3 to their Motion (e.g., cross-reference 3.9 means number 9 on Complainants' Exhibit 3).

WHEREFORE, UGI respectfully requests that the Complainants' request for Summary Judgement on its claim that 14 meters allegedly violate Section 52 Pa. Code § 59.18(a)(8)(vi) by being installed in contact with soil or other potentially corrosive materials be denied.

IV. CONCLUSION

For the reasons set forth above, UGI Utilities, Inc. respectfully requests that Administrative Law Judge deny the Motion for Partial Summary Judgment filed by the City of Reading and Centre Park Historic District.

Respectfully submitted,



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Dated: July 26, 2017

Attorneys for UGI Utilities, Inc.

Exhibit 1

**UGI Exhibit 1 (Update to Exhibit 1 of Complainants' Motion)
Gas Meters Allegedly in Violation of 52 Pa. Code § 59.18(a)(8)(i)
(Window Fire Exit)**

1. 1617 Bern St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
2. 647 Bingaman St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
3. 633 Clinton St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
4. 657 Clinton St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
5. 671 Clinton St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
6. 514 Chestnut St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
7. 911 Cotton St, Reading, PA
 - Non-Historic District

- Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
8. 927 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 9. 939 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 10. 945 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 11. 953 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 12. 955 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 13. 1032 Cotton St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 14. 1047 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

- Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
15. 1121 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 16. 1125 Cotton St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 17. 1135 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 18. 1136 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 19. 1205 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 20. 1221 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 21. 1259 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

- Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
22. 1317 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
23. 1333 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
24. 1341 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
25. 1343 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
26. 1359 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
27. 1408 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
28. 1547 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation

- Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
29. 1600 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
30. 1733 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
31. 1753 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
32. 1754 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
33. 1761 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
34. 1817 Cotton St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)

35. 1825 Cotton St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
36. 603 Eisenbrown St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
37. 609 Eisenbrown St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
38. 613 Eisenbrown St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
39. 652 Eisenbrown St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
40. 656 Eisenbrown St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
41. 658 Eisenbrown St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
42. 664 Eisenbrown St, Reading, PA
 - Historic District

- Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
43. 666 Eisenbrown St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
44. 809 Gordon St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
45. 818 Gordon St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
46. 819 Gordon St, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
47. 1200 Hampden Blvd, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
48. 135 Hudson St, Reading, PA
- Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
49. 517 Laurel St, Reading, PA
- Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.

50. 527 Laurel St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
51. 1320 Linden St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
52. 517 Minor St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
53. 107 Mulberry St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
54. 805 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
55. 813 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
56. 820 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
57. 830 N 10th St, Reading, PA
 - Non-Historic District

- Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
58. 832 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
59. 848 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
60. 900 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
61. 908 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
62. 916 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
63. 1001 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
64. 1002 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
65. 1007 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
66. 1011 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
67. 1012 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
68. 1018 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)

69. 1040 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
70. 1050 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
71. 1056 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
72. 1058 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
73. 1113 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
74. 1126 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
75. 1128 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
76. 1155 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
77. 1159 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
78. 1202 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)

79. 1204 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
80. 1205 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
81. 1206 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
82. 1207 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
83. 1208 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

- Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
84. 1216 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
85. 1240 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
86. 1242 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
87. 1257 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
88. 1332 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
89. 1338 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
90. 1346 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
91. 1354 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
92. 1357 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
93. 1406 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
94. 1408 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
95. 1412 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)

96. 1420 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)

97. 1437 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

98. 1441 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

99. 1445 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

100. 1450 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

101. 1453 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)

102. 1456 N 10th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
103. 1462 N 10th St, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
104. 1500 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
105. 1504 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
106. 1506 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
107. 1510 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
108. 1512 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
109. 1561 N 10th St, Reading, PA
- Non-Historic District

- Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
110. 1568 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
111. 1644 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
112. 1646 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
113. 1648 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
114. 1649 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
115. 1657 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
116. 1664 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
117. 1666 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
118. 1649 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
119. 516 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
120. 525 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
121. 646 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
122. 729 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
123. 732 N 10th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
124. 1663 N 10th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
125. 1139 N 13th St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
126. 1164 N 13th St, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
127. 1307 N 13th St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)

128. 1400 N 13th St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
129. 419 Oley St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
130. 1816 Olive St, Reading, PA
 - Historic District
 - Inactive
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
131. 1931 Olive St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
132. 107 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
133. 108 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
134. 110 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
135. 116 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
136. 136 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
137. 200 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
138. 202 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
139. 204 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
140. 207 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
141. 209 S 4th St, Reading, PA
- Non-Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
142. 215 S 4th St, Reading, PA
- Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

143. 219 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
144. 225 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
145. 232 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
146. 252 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
147. 303 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
148. 339 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
149. 343 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
150. 409 S 4th St, Reading, PA
 - Non-Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

151. 310 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
152. 319 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
153. 321 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
154. 323 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
155. 331 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
156. 336 N 5th St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
157. 417 S 5th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
158. 614 S 7th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
159. 508 Schuylkill Ave, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
160. 540 Schuylkill Ave, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.

- Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
161. 546 Schuylkill Ave, Reading, PA
- Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
162. 631 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
163. 633 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
164. 634 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
165. 637 Schuylkill Ave, Reading, PA
- Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
166. 639 Schuylkill Ave, Reading, PA
- Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
167. 718 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)

168. 724 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
169. 728 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
170. 742 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
171. 808 Schuylkill Ave, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
172. 434 Spring St, Reading, PA
- Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
173. 630 Thorn St, Reading, PA
- Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
174. 534 Tulpehocken St, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.

175. 552 Tulpehocken St, Reading, PA
 - Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
176. 146 W Green St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
177. 158 W Green St, Reading, PA
 - Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
178. 178 W Green St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
179. 182 W Green St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether under a window that could be a fire exit.
180. 186 W Green St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
181. 188 W Green St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
182. 194 W Green St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
183. 260 W Oley St, Reading, PA
 - Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.

184. 478 W Oley St, Reading, PA
- Historic District
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
185. 127 W Windsor St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
186. 148 W Windsor St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
187. 150 W Windsor St, Reading, PA
- Historic District
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
188. 154 W Windsor St, Reading, PA
- Historic District
 - Predates Regulation
 - Concede not a fire exit
 - Disputed Material Fact whether under a window that could be a fire exit.
 - Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)
 - Window(s) in picture appear to be barred, boarded up, small basement window(s), or large store front window(s) (see Answer, footnote 11)
189. 163 W Windsor St, Reading, PA
- Historic District
 - Concede not a fire exit

- Disputed Material Fact whether under a window that could be a fire exit.
- Located off to the side of any windows or in front of the property's porch (see Answer, footnote 10)

Exhibit 2

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date	7. Under a Window (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)	UGI Stipulates	City/CPHD Claim for Summary Judgment	City/CPHD Exhibit No.
HT	1617	Bern St	11/06/14	Y		N	Y	Window Fire Exit	1.1
PR	627	Bingaman St	01/15/15	Y		N	Y	Window Fire Exit	1.2
PR	514	Chestnut St	08/16/90	Y		Y		Window Fire Exit	1.6
QA	633	Clinton St	07/09/12	Y		N	Y	Window Fire Exit	1.3
QA	657	Clinton St	06/23/87	Y		N	Y	Window Fire Exit	1.4
QA	671	Clinton St	05/04/15	Y		N	Y	Window Fire Exit	1.5
QA	603	Eisenbrown St	02/28/14	Y		N	Y	Window Fire Exit	1.36
QA	609	Eisenbrown St	06/18/14	Y		N	Y	Window Fire Exit	1.37
QA	613	Eisenbrown St	07/21/15	Y		N	Y	Window Fire Exit	1.38
QA	652	Eisenbrown St	07/22/15	Y		N	Y	Window Fire Exit	1.39
QA	656	Eisenbrown St	07/22/15	Y		N	Y	Window Fire Exit	1.40
QA	658	Eisenbrown St	11/06/15	Y		N	Y	Window Fire Exit	1.41
QA	664	Eisenbrown St	07/23/15	Y		N	Y	Window Fire Exit	1.42
QA	666	Eisenbrown St	07/23/15	Y		N	Y	Window Fire Exit	1.43
QA	809	Gordon St	05/21/15	Y		N	Y	Window Fire Exit	1.44
QA	818	Gordon St	05/21/15	Y		N	Y	Window Fire Exit	1.45
QA	819	Gordon St	01/25/85	Y		N	Y	Window Fire Exit	1.46
HT	1200	Hampden Blvd	06/09/14	Y		N	Y	Window Fire Exit	1.47
QA	135	Hudson St	09/16/11	Y		Y		Window Fire Exit	1.48
PR	517	Laurel St	08/01/12	Y		Y		Window Fire Exit	1.49
PR	527	Laurel St	07/31/12	Y		Y		Window Fire Exit	1.50
HT	1320	Linden St	06/12/14	Y		N	Y	Window Fire Exit	1.51
PR	517	Minor St	04/21/16	Y		Y		Window Fire Exit	1.52
PC	107	Mulberry St	03/03/15	Y		N	Y	Window Fire Exit	1.53
HT	1139	N 13th St	09/05/15	Y		N	Y	Window Fire Exit	1.125
HT	1164	N 13th St	02/26/08	Y		N	Y	Window Fire Exit	1.126
HT	1307	N 13th St	07/07/15	Y		N	Y	Window Fire Exit	1.127
HT	1400	N 13th St	04/16/15	Y		N	Y	Window Fire Exit	1.128
CH	310	N 5th St	06/18/15	Y		Y		Window Fire Exit	1.151
CH	319	N 5th St	06/25/15	Y		Y		Window Fire Exit	1.152
CH	321	N 5th St	07/08/15	Y		Y		Window Fire Exit	1.153
CH	323	N 5th St	07/09/15	Y		Y		Window Fire Exit	1.154
CH	331	N 5th St	07/22/15	Y		Y		Window Fire Exit	1.155
CH	336	N 5th St	07/22/15	Y		N	Y	Window Fire Exit	1.156
CP	419	Oley St	12/31/09	Y		N	Y	Window Fire Exit	1.129
HT	1816	Olive St	inactive	Y		N	Y	Window Fire Exit	1.130
HT	1931	Olive St	11/10/06	Y		N	Y	Window Fire Exit	1.131
CH	417	S 5th St	10/05/11	Y		Y		Window Fire Exit	1.157
PR	614	S 7th St	06/03/14	Y		Y		Window Fire Exit	1.158
QA	508	Schuylkill Ave	09/26/13	Y		N	Y	Window Fire Exit	1.159

CH = Callowhill; CP = Centre Park; HT = Heights; PR = Prince; PC = Penn's Commons; QA = Queen Anne

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date	7. Under a Window (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)	UGI Stipulates	City/CPHD Claim for Summary Judgment	City/CPHD Exhibit No.
QA	540	Schuylkill Ave	09/06/14	Y		Y		Window Fire Exit	1.160
QA	546	Schuylkill Ave	10/28/13	Y		Y		Window Fire Exit	1.161
QA	631	Schuylkill Ave	10/02/14	Y		N	Y	Window Fire Exit	1.162
QA	633	Schuylkill Ave	10/02/14	Y		N	Y	Window Fire Exit	1.163
QA	634	Schuylkill Ave	10/07/14	Y		N	Y	Window Fire Exit	1.164
QA	637	Schuylkill Ave	10/07/14	Y		Y		Window Fire Exit	1.165
QA	639	Schuylkill Ave	10/07/14	Y		Y		Window Fire Exit	1.166
QA	718	Schuylkill Ave	10/29/14	Y		N	Y	Window Fire Exit	1.167
QA	724	Schuylkill Ave	10/31/14	Y		N	Y	Window Fire Exit	1.168
QA	728	Schuylkill Ave	11/10/14	Y		N	Y	Window Fire Exit	1.169
QA	742	Schuylkill Ave	11/13/14	Y		N	Y	Window Fire Exit	1.170
QA	808	Schuylkill Ave	04/28/15	Y		N	Y	Window Fire Exit	1.171
CP	434	Spring St	04/19/11	Y		Y		Window Fire Exit	1.172
QA	630	Thorn St	11/10/10	Y		Y		Window Fire Exit	1.173
QA	534	Tulpehocken St	01/18/10	Y		N	Y	Window Fire Exit	1.174
QA	552	Tulpehocken St	12/10/12	Y		N	Y	Window Fire Exit	1.175
QA	146	W Green St	08/27/14	Y		Y		Window Fire Exit	1.176
QA	158	W Green St	05/13/15	Y		N	Y	Window Fire Exit	1.177
QA	178	W Green St	09/10/14	Y		Y		Window Fire Exit	1.178
QA	182	W Green St	09/12/14	Y		Y		Window Fire Exit	1.179
QA	186	W Green St	04/03/15	Y		Y		Window Fire Exit	1.180
QA	188	W Green St	09/15/14	Y		Y		Window Fire Exit	1.181
QA	194	W Green St	09/18/14	Y		Y		Window Fire Exit	1.182
QA	260	W Oley St	06/23/15	Y		Y		Window Fire Exit	1.183
QA	478	W Oley St	04/06/15	Y		Y		Window Fire Exit	1.184
QA	127	W Windsor St	06/14/16	Y		N	Y	Window Fire Exit	1.185
QA	148	W Windsor St	05/11/16	Y		N	Y	Window Fire Exit	1.186
QA	150	W Windsor St	06/23/16	Y		N	Y	Window Fire Exit	1.187
QA	154	W Windsor St	11/05/11	Y		N	Y	Window Fire Exit	1.188
QA	163	W Windsor St	04/25/16	Y		N	Y	Window Fire Exit	1.189

Note: 614 Eisenbrown Street is not listed in Motion Exhibit 1, but Motion Exhibit A-1 provides photographs for that property. For reference, the stipulated service line installation data shows that the meter was installed on December 29, 2013, i.e., before the amended Section 59.18 became effective. Further, the Complainants have conceded in their historic meter matrix that the meter is not located under an opening that could be a fire exit.

Exhibit 3

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Non-Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date					CITY/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.
				7. Under a window? (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)	UGI Stipulates		
N	1825	Cotton St	10/23/09	Y		N	Y	Window Exit	1.35
N	1817	Cotton St	10/23/09	Y		N	Y	Window Exit	1.34
N	911	Cotton St	11/20/09	Y		N	Y	Window Exit	1.7
N	1011	N 10th St	04/03/13	Y		N	Y	Window Exit	1.66
N	1012	N 10th St	04/04/13	Y		N	Y	Window Exit	1.67
N	927	Cotton St	11/19/09	Y		N	Y	Window Exit	1.8
N	939	Cotton St	10/29/09	Y		N	Y	Window Exit	1.9
N	945	Cotton St	10/27/09	Y		N	Y	Window Exit	1.10
N	1007	N 10th St	04/03/13	Y		N	Y	Window Exit	1.65
N	1002	N 10th St	03/29/13	Y		N	Y	Window Exit	1.64
N	1001	N 10th St	03/29/13	Y		N	Y	Window Exit	1.63
N	953	Cotton St	10/27/09	Y		N	Y	Window Exit	1.11
N	955	Cotton St	10/27/09	Y		N	Y	Window Exit	1.12
N	832	N 10th St	11/18/13	Y		N	Y	Window Exit	1.58
N	1058	N 10th St	05/06/13	Y		N	Y	Window Exit	1.72
N	1056	N 10th St	05/07/13	Y		N	Y	Window Exit	1.71
N	1050	N 10th St	05/02/13	Y		N	Y	Window Exit	1.70
N	1040	N 10th St	04/30/13	Y		N	Y	Window Exit	1.69
N	916	N 10th St	06/03/13	Y		N	Y	Window Exit	1.62
N	729	N 10th St	08/02/13	Y		N	Y	Window Exit	1.122
N	820	N 10th St	12/18/13	Y		N	Y	Window Exit	1.56
N	830	N 10th St	11/18/13	Y		N	Y	Window Exit	1.57
N	1338	N 10th St	09/01/15	Y		N	Y	Window Exit	1.89
N	108	S 4th St	10/29/15	Y		N	Y	Window Exit	1.133
N	409	S 4th St	10/06/15	Y		N	Y	Window Exit	1.150
N	110	S 4th St	12/15/15	Y		N	Y	Window Exit	1.134
N	116	S 4th St	12/15/15	Y		N	Y	Window Exit	1.135
N	339	S 4th St	11/06/15	Y		N	Y	Window Exit	1.148
N	343	S 4th St	11/03/15	Y		N	Y	Window Exit	1.149
N	303	S 4th St	11/25/15	Y		N	Y	Window Exit	1.147
N	136	S 4th St	12/15/15	Y		N	Y	Window Exit	1.136
N	200	S 4th St	12/15/15	Y		N	Y	Window Exit	1.137
N	202	S 4th St	12/15/15	Y		N	Y	Window Exit	1.138
N	204	S 4th St	12/09/15	Y		N	Y	Window Exit	1.139
N	207	S 4th St	12/28/15	Y		N	Y	Window Exit	1.140

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Non-Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date				CITY/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.	
				7. Under a window? (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)			
N	215	S 4th St	12/29/15	Y		N	Y	Window Exit	1.142
N	219	S 4th St	12/18/15	Y		N	Y	Window Exit	1.143
N	225	S 4th St	03/14/16	Y		N	Y	Window Exit	1.144
N	232	S 4th St	12/28/15	y		N	Y	Window Exit	1.145
N	252	S 4th St	12/11/15	Y		N	Y	Window Exit	1.146
N	813	N 10th St	01/17/13	Y		N	Y	Window Exit	1.55
N	900	N 10th St	11/18/13	Y		N	Y	Window Exit	1.60
N	908	N 10th St	11/18/13	Y		N	Y	Window Exit	1.61
N	1018	N 10th St	04/06/16	Y		N	Y	Window Exit	1.68
N	1216	N 10th St	04/16/14	Y		N	Y	Window Exit	1.84
N	732	N 10th St	11/19/15	Y		N	Y	Window Exit	1.123
N	1561	N 10th St	08/20/14	Y		N	Y	Window Exit	1.109
N	1420	N 10th St	11/08/14	Y		N	Y	Window Exit	1.96
N	1257	N 10th St	02/13/15	Y		N	Y	Window Exit	1.87
N	1332	N 10th St	02/13/15	Y		N	Y	Window Exit	1.88
N	1032	Cotton St	03/30/15	Y		N	Y	Window Exit	1.13
N	1126	N 10th St	08/28/15	Y		N	Y	Window Exit	1.74
N	1125	Cotton St	11/25/15	Y		N	Y	Window Exit	1.16
N	1047	Cotton St	03/19/10	Y		N	Y	Window Exit	1.14
N	1733	Cotton St	11/19/09	Y		N	Y	Window Exit	1.30
N	1753	Cotton St	11/12/09	Y		N	Y	Window Exit	1.31
N	1754	Cotton St	12/03/09	Y		N	Y	Window Exit	1.32
N	1761	Cotton St	11/12/09	Y		N	Y	Window Exit	1.33
N	1121	Cotton St	04/05/11	Y		N	Y	Window Exit	1.15
N	1135	Cotton St	09/24/10	Y		N	Y	Window Exit	1.17
N	1136	Cotton St	10/12/10	Y		N	Y	Window Exit	1.18
N	1205	Cotton St	11/16/10	Y		N	Y	Window Exit	1.19
N	1221	Cotton St	11/16/10	Y		N	Y	Window Exit	1.20
N	1259	Cotton St	12/19/10	Y		N	Y	Window Exit	1.21
N	1317	Cotton St	12/30/10	Y		N	Y	Window Exit	1.22
N	1333	Cotton St	01/13/11	Y		N	Y	Window Exit	1.23
N	1341	Cotton St	01/21/11	Y		N	Y	Window Exit	1.24
N	1343	Cotton St	01/21/11	Y		N	Y	Window Exit	1.25
N	1359	Cotton St	02/25/11	Y		N	Y	Window Exit	1.26
N	1547	Cotton St	01/13/11	Y		N	Y	Window Exit	1.28

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Non-Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date					CITY/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.
				7. Under a window? (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)	UGI Stipulates		
N	1600	Cotton St	03/30/11	Y		N	Y	Window Exit	1.29
N	1663	Cotton St	09/06/11	Y		N	Y	Window Exit	1.124
N	1408	Cotton St	07/20/11	Y		N	Y	Window Exit	1.27
N	1500	N 10th St	12/24/11	Y		N	Y	Window Exit	1.104
N	1504	N 10th St	12/16/11	Y		N	Y	Window Exit	1.105
N	1506	N 10th St	12/16/11	Y		N	Y	Window Exit	1.106
N	1510	N 10th St	12/13/11	Y		N	Y	Window Exit	1.107
N	1512	N 10th St	12/09/11	Y		N	Y	Window Exit	1.108
N	1568	N 10th St	08/27/11	Y		N	Y	Window Exit	1.110
N	516	N 10th St	10/08/12	Y		N	Y	Window Exit	1.119
N	525	N 10th St	10/10/12	Y		N	Y	Window Exit	1.120
N	646	N 10th St	11/08/12	Y		N	Y	Window Exit	1.121
N	1202	N 10th St	10/23/12	Y		N	Y	Window Exit	1.78
N	1204	N 10th St	10/23/12	Y		N	Y	Window Exit	1.79
N	1205	N 10th St	10/23/12	Y		N	Y	Window Exit	1.80
N	1206	N 10th St	10/23/12	Y		N	Y	Window Exit	1.81
N	1207	N 10th St	10/12/12	Y		N	Y	Window Exit	1.82
N	1208	N 10th St	10/12/12	Y		N	Y	Window Exit	1.83
N	1240	N 10th St	09/13/12	Y		N	Y	Window Exit	1.85
N	1242	N 10th St	05/27/78	Y		N	Y	Window Exit	1.86
N	1406	N 10th St	06/28/12	Y		N	Y	Window Exit	1.93
N	1408	N 10th St	06/20/12	Y		N	Y	Window Exit	1.94
N	1412	N 10th St	06/15/12	Y		N	Y	Window Exit	1.95
N	1437	N 10th St	06/05/12	Y		N	Y	Window Exit	1.97
N	1441	N 10th St	06/05/12	Y		N	Y	Window Exit	1.98
N	1445	N 10th St	05/16/12	Y		N	Y	Window Exit	1.99
N	1450	N 10th St	05/16/12	Y		N	Y	Window Exit	1.100
N	1453	N 10th St	06/28/12	Y		N	Y	Window Exit	1.101
N	1456	N 10th St	05/04/12	Y		N	Y	Window Exit	1.102
N	1462	N 10th St	05/04/12	Y		N	Y	Window Exit	1.103
N	1346	N 10th St	07/23/12	Y		N	Y	Window Exit	1.90
N	1354	N 10th St	07/11/12	Y		N	Y	Window Exit	1.91
N	1357	N 10th St	07/13/12	Y		N	Y	Window Exit	1.92
N	1113	N 10th St	03/06/13	Y		N	Y	Window Exit	1.73
N	1128	N 10th St	02/05/13	Y		N	Y	Window Exit	1.75

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Non-Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date					CITY/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.
				7. Under a window? (Y/N)	UGI Stipulates	9. Under an opening that could be a fire exit? (Y/N)	UGI Stipulates		
N	1155	N 10th St	01/15/13	Y		N	Y	Window Exit	1.76
N	1159	N 10th St	01/15/13	Y		N	Y	Window Exit	1.77
N	805	N 10th St	12/27/13	Y		N	Y	Window Exit	1.54
N	848	N 10th St	10/09/13	Y		N	Y	Window Exit	1.59
N	1644	N 10th St	07/12/11	Y		N	Y	Window Exit	1.111
N	1646	N 10th St	07/12/11	Y		N	Y	Window Exit	1.112
N	1648	N 10th St	07/11/11	Y		N	Y	Window Exit	1.113
N	1649	N 10th St	07/01/11	Y		N	Y	Window Exit	1.114
N	1657	N 10th St	06/30/11	Y		N	Y	Window Exit	1.115
N	1664	N 10th St	06/24/11	Y		N	Y	Window Exit	1.116
N	1666	N 10th St	06/21/11	Y		N	Y	Window Exit	1.117
N	1649 ½	N 10th St	07/01/11	Y		N	Y	Window Exit	1.118
N	107	S 4th St	05/14/15	Y		N	Y	Window Exit	1.132
N	209	S 4th St	06/18/12	Y		N	Y	Window Exit	1.141

Exhibit 4

**UGI Exhibit 4 (Update to Exhibit 2 of Complainants' Motion)
Gas Meters Allegedly in Violation of 52 Pa. Code § 59.18(a)(8)(v)
(Near Air Intake)**

1. 1234 Alsace Rd, Reading, PA
 - Historic District
 - Disputed Material Fact whether near air intake
2. 1034 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake
3. 638 N 10th St, Reading, PA
 - Non-Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake
4. 1708 Olive St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake
5. 1710 Olive St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake
6. 823 Schuylkill Ave, Reading, PA
 - Historic District
 - Disputed Material Fact whether near air intake
7. 731 Thorn St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake
8. 523 Tulpehocken St, Reading, PA
 - Historic District
 - Disputed Material Fact whether near air intake
9. 527 Tulpehocken St, Reading, PA
 - Historic District
 - Disputed Material Fact whether near air intake
10. 1032 Weiser St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether near air intake

Exhibit 5

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date	10. Near a building air intake? (Y/N)	City/CPHD Claim for Summary Judgment	City/CPHD Exhibit No.
				UGI Stipulates		
HT	1234	Alsace Rd	12/09/14	Y	Air Intake	2.1
HT	1708	Olive St	06/01/10	Y	Air Intake	2.4
HT	1710	Olive St	05/28/81	Y	Air Intake	2.5
QA	823	Schuylkill Ave	07/24/15	Y	Air Intake	2.6
QA	731	Thorn St	12/29/08	Y	Air Intake	2.7
QA	523	Tulpehocken St	05/22/15	Y	Air Intake	2.8
QA	527	Tulpehocken St	01/22/15	Y	Air Intake	2.9
QA	1032	Weiser St	08/13/84	Y	Air Intake	2.10

Exhibit 6

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Non-Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date	10. Near a building air intake? (Y/N)	UGI Stipulates	CITY/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.
N	1034	N 10th St	04/22/13	Y		Air Intake	2.2
N	638	N 10th St	10/30/12	Y		Air Intake	2.3

Exhibit 7

**UGI Exhibit 7 (Update to Exhibit 3 of Complainants' Motion)
Gas Meters Allegedly in Violation of 52 Pa. Code § 59.18(a)(8)(vi)
(Contact with Soil)**

1. 454 Douglass St, Reading, PA
 - Historic District
 - Disputed Material Fact whether in contact with soil
2. 746 Gordon St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
 - View obstructed or too far away to tell if meter is in contact with the ground (see Answer, footnote 13)
3. 1102 Hampden Blvd, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
 - View obstructed or too far away to tell if meter is in contact with the ground (see Answer, footnote 13)
4. 1316 N 14th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
 - View obstructed or too far away to tell if meter is in contact with the ground (see Answer, footnote 13)
5. 1516 N 15th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
 - View obstructed or too far away to tell if meter is in contact with the ground (see Answer, footnote 13)
6. 726 N 2nd St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
7. 947 N 5th St, Reading, PA
 - Historic District
 - Disputed Material Fact whether in contact with soil
8. 1034 N 5th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil

9. 1037 N 5th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
10. 1041 N 5th St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
11. 1421 Palm St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
12. 1503 Palm St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
 - View obstructed or too far away to tell if meter is in contact with the ground (see Answer, footnote 13)
 - Appears to be located above stones (see Answer, footnote 14)
13. 1020 Weiser St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil
14. 1040 Weiser St, Reading, PA
 - Historic District
 - Predates Regulation
 - Disputed Material Fact whether in contact with soil

Exhibit 8

CITY OF READING GAS METER SURVEY RESULTS MATRIX (Historic District Properties)

1. Historic District	2. Street #	3. Street Name	Service Install Date	12. Is meter/ regulator in contact with soil/corrosive materials (Y/N)	UGI Stipulates	City/CPHD Claim for Summary Judgment	City/CPHD Exhibit No. and List No.
CP	454	Douglass St	03/17/15	Y		Soil	3.1
QA	746	Gordon St	09/27/84	Y		Soil	3.2
HT	1102	Hampden Blvd	06/12/14	Y		Soil	3.3
HT	1316	N 14th St	09/18/84	Y		Soil	3.4
HT	1516	N 15th St	06/09/83	Y		Soil	3.5
QA	726	N 2nd St	11/12/82	Y		Soil	3.6
CP	947	N 5th St	10/21/15	Y		Soil	3.7
CP	1034	N 5th St	05/19/98	Y		Soil	3.8
CP	1037	N 5th St	05/20/98	Y		Soil	3.9
CP	1041	N 5th St	12/02/10	Y		Soil	3.10
HT	1421	Palm St	01/09/81	Y		Soil	3.11
HT	1503	Palm St	03/25/96	Y		Soil	3.12
QA	1020	Weiser St	09/21/09	Y		Soil	3.13
QA	1040	Weiser St	09/23/09	Y		Soil	3.14

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Centre Park Historic District	:	Docket Nos. C-2015-2516051
City of Reading	:	C-2016-2530475
	:	
v.	:	
	:	
UGI Utilities, Inc.	:	

VERIFICATION

I, Christopher Brown, being Director – Operations South Region for UGI Utilities, Inc., hereby state that the information set forth above is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 7/26/17



Christopher Brown