

THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

CHARLES E. THOMAS, JR.
Direct Dial: 717.255.7615
cthomasjr@tntlawfirm.com

December 28, 2018

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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:

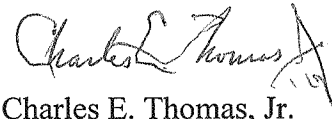
Enclosed for electronic filing on behalf of the City of Reading is its Motion to Reopen the Record in the above-referenced proceeding. Copies of the Motion are being served in accordance with the attached Certificate of Service.

Should the Commission have any questions, please do not hesitate to contact us.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By



Charles E. Thomas, Jr.

Enclosure

cc: Certificate of Service
Elizabeth Kraft, Esq.
John Slifko

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.	:	

MOTION TO REOPEN THE RECORD

Pursuant to 52 Pa. Code §§ 5.431(b) and 5.571, the City of Reading (the “City”), by and through its attorneys, respectfully requests that the record in this consolidated proceeding be reopened for the limited purpose of admitting into evidence a customer notification letter which differs from the revised notification letter UGI Utilities, Inc. (“UGI”) said it would be using in connection with the consideration of inside meter placements in compliance with 52 Pa. Code § 59.18(d). In support thereof, the City avers as follows:

1. On August 22 and 23, 2018, evidentiary hearings were held in this matter. By Interim Order issued December 11, 2018, the record was closed.
2. The matter of UGI’s customer notification letter concerning the relocation of meters from inside to outside locations is a major issue, especially with respect to arguments relating to consideration issues, in the proceeding and was addressed at the hearings and in the parties’ respective briefs.¹ The City has become aware of use by UGI of a customer notification

¹ See, e.g., Tr. 344-46; UGI Responsive Brief at 33-35; City Reply Brief at 7, 14-16.

letter which differs from assertions made by UGI in its brief concerning the revised customer notification letter it has supposedly been using since October of 2017.²

3. In its Reply Brief dated December 7, 2018, the City indicated that recent correspondence received by City customers suggested that UGI was reverting to its pre-October 2017 notification.³ Specifically, attached hereto is a letter in both English and Spanish, dated December 20, 2018, that was received by the listed customers in the City's Heights Conservation District. The letter is contrary to UGI Exhibit CB-16 which supposedly contained UGI's "current" notification letter, and to the testimony of UGI witness Brown (Tr. 344-46). The English version of the letter expressly states: "If your meter and regulator are inside, we will have to move them outside, due to company policy." The Spanish version also references company policy which the City understood had been eliminated from Company notices.

4. Under the Pennsylvania Public Utility Commission's regulations, "[a]fter the record is closed, additional matter may not be relied upon or accepted into the record unless allowed for good cause shown by the presiding officer or the Commission upon motion." 52 Pa. Code § 5.431(b). Additionally, pursuant to 52 Pa. Code § 5.571(a), "[a]t any time after the record is closed but before a final decision is issued, a party may file a petition to reopen the proceeding for the purpose of taking additional evidence." Such a petition may be based on "material changes of fact or of law alleged to have occurred since the conclusion of the hearing." 52 Pa. Code § 5.571(b).

5. The City submits that good cause exists to admit the December 20, 2018 letter attached hereto because, as noted above, it directly contradicts the statements made by UGI's witness at the hearings and the supposed notification letter currently in use by UGI marked as

² See Tr. 344; UGI Exh. CB-16.

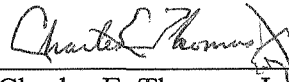
³ City Reply Brief at 15 n.46.

UGI Exhibit CB-16. The December 20, 2018 letter, moreover, constitutes a material change of fact which has occurred since the conclusion of the hearings in this matter. Accordingly, the City's limited motion to reopen the record satisfies the standards of 52 Pa. Code §§ 5.431(b) and 5.571 and should be granted.

6. The City respectfully requests that the attached English and Spanish versions of the December 20, 2018 letter and the list of customer recipients be admitted into the record as City of Reading Post Closing Exhibit 1 and that the Interim Order of December 11, 2018 be amended for the limited purpose of admitting the City's Post Closing Exhibit 1.

WHEREFORE, for the foregoing reasons, Complainant City of Reading respectfully requests that this Motion be granted and the record in this proceeding be reopened for the limited purpose of admitting into evidence its Post Closing Exhibit No. 1, attached hereto.

Respectfully submitted,



Charles E. Thomas, Jr. (PA ID # 07262)
Charles E. Thomas, III (PA ID # 201014)
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
Tel: 717.255.7600
cthomasjr@tntlawfirm.com
cet3@tntlawfirm.com

Attorneys for City of Reading

DATED: December 28, 2018

ATTACHMENT

CITY OF READING

POST CLOSING EXHIBIT No. 1



UGI Utilities, Inc
225 Morgantown Rd
Reading, PA 19612

December 20, 2018

Subject: Scheduled Maintenance Work on Gas Lines

Dear Resident,

UGI Utilities, Inc. has scheduled to perform maintenance work on the gas facilities near your property. This project will begin in the near future. **There is no charge to you for the actual replacement of your natural gas service line.** However, UGI may need to gain access to your property to do this work. Also, if the meter and regulator are inside, we will need to move them outside, due to company policy.

You can help us complete the work and minimize the inconvenience caused to you and your neighbors by complying with the parking restrictions we require.

Our crew leaders assigned to this project will contact you at some time during the project to explain what exactly is to be done. If you have any questions during the construction, please contact the UGI inspector on site or the contact below.

If you currently do not have gas service and would like to obtain it, please contact one of our gas conversion specialists at 1-800-276-2722 or visit www.ugi.com/maketheswitch.

I thank you for any and all cooperation you can give so that this job can be completed in a timely fashion with the least possible inconvenience to you.

Sincerely,

Chris Pradel

Construction and Maintenance Supervisor
610-736-5440



Energy to do more®

December 20, 2018

Asunto: Tareas de mantenimiento programado en líneas de gas

Estimado residente:

UGI Utilities, Inc. ha programado tareas de mantenimiento de tuberías de gas próximas a su propiedad. Este proyecto se iniciará en el futuro cercano. **No se le impondrá cargo alguno por el reemplazo propiamente dicho de su línea de servicio de gas natural.** Sin embargo, es posible que UGI necesite tener acceso a su propiedad para realizar estas tareas. Además, si el medidor y el regulador se encuentran dentro de su propiedad, deberemos reposicionarlos en el exterior, en cumplimiento de la política de la compañía.

Para ayudarnos a completar el trabajo y reducir al mínimo las molestias que esto pueda causarle y causar a sus vecinos, acate las restricciones de estacionamiento que imponemos.

Nuestros jefes de cuadrilla asignados a este proyecto se pondrán en contacto con usted en algún momento del proyecto para explicarle qué se hará exactamente. Si tiene preguntas durante la construcción, póngase en contacto con el inspector de UGI que se encuentre en el sitio de trabajo, o bien utilice la información de contacto a continuación.

Si actualmente no cuenta con servicio de gas y le gustaría obtenerlo, llame al 1-800-276-2722 o visite www.ugi.com/maketheswitch para ponerse en contacto con uno de nuestros expertos en conversión a gas.

Le agradezco toda colaboración que pueda brindarnos para que se pueda completar este trabajo lo antes posible y con un mínimo de molestias para usted.

Atentamente,

Chris Pradel

Supervisor de mantenimiento y construcción
610-736-5440

<i>Name</i>	<i>HOUSE</i>	<i>DIR</i>	<i>STREET</i>	<i>TYPE</i>	<i>APT</i>	<i>City</i>
Richard E Marsh	1614 N		15TH	ST		READING, PA 19604
Elizabeth Stamm	1622 N		15TH	ST		READING, PA 19604
JR Jimmy Quinones	1703 N		15TH	ST		READING, PA 19604
Harry D Bentz	1429		UNION	ST		READING, PA 19604
Linda Burns-Glover	1624 N		15TH	ST		READING, PA 19604
Carla V Garcia	1605 N		15TH	ST		READING, PA 19604
Steven R Pelker	1607 N		15TH	ST		READING, PA 19604
Steven A Rossignoli	1608 N		15TH	ST		READING, PA 19604
Christina Macdonald	1609 N		15TH	ST		READING, PA 19604
Rafael Quijada	1611 N		15TH	ST		READING, PA 19604
Jeffrey M Lillis	1615 N		15TH	ST		READING, PA 19604
Richard Gery	1617 N		15TH	ST		READING, PA 19604
Ronda Morrison	1619 N		15TH	ST		READING, PA 19604
Randy Tobal	1621 N		15TH	ST		READING, PA 19604
Kathleen Babcock	1701 N		15TH	ST		READING, PA 19604
Frances V Frezeman	1707 N		15TH	ST		READING, PA 19604
Sarah LIEN Trang	1711 N		15TH	ST		READING, PA 19604
Sarah LIEN Trang	1711 N		15TH	ST		READING, PA 19604
JR Robert B Killian	1626 N		15TH	ST		READING, PA 19604
JR Robert B Killian	1626 N		15TH	ST		READING, PA 19604
Lawrence M Miller	1612 N		15TH	ST		READING, PA 19604
William M King	1610 N		15TH	ST		READING, PA 19604
Ricardo G Bailey	1606 N		15TH	ST		READING, PA 19604
Linda A Kelleher	1521 N		15TH	ST		READING, PA 19604
Jeffrey A Brenner	1519 N		15TH	ST		READING, PA 19604
William P Pappas	1517 N		15TH	ST		READING, PA 19604
Gerald J Richter	1515 N		15TH	ST		READING, PA 19604
Awilda Valdez	1501 N		15TH	ST		READING, PA 19604
Charles R Broad	1500 N		15TH	ST		READING, PA 19604
Barry Dobinsky	1504 N		15TH	ST		READING, PA 19604
Michael J Hallowell	1508 N		15TH	ST		READING, PA 19604
Shirley Jacobs	1510 N		15TH	ST		READING, PA 19604
Steven W Fisher	1514 N		15TH	ST		READING, PA 19604
Robert J Hospidor	1516 N		15TH	ST		READING, PA 19604
Edward L Myers	1518 N		15TH	ST		READING, PA 19604
Brooke Laws	1428		AMITY	ST		READING, PA 19604
Michael C Bucher	1430		AMITY	ST		READING, PA 19604
John Dethoff	1512 N		15TH	ST		READING, PA 19604
Victoria Hollister	1613 N		15TH	ST		READING, PA 19604
Wali Bilal	1618 N		15TH	ST		READING, PA 19604
Joanne Katz	1616 N		15TH	ST		READING, PA 19604
Richard Androne	1615		PALM	ST		READING, PA 19604
Luis Otero	1523 N		15TH	ST		READING, PA 19604
Current Resident	1506 N		15TH	ST		READING, PA 19604
Current Resident	1427		UNION	ST		READING, PA 19604
Current Resident	1620 N		15TH	ST		READING, PA 19604
Current Resident	1705 N		15TH	ST		READING, PA 19604
Current Resident	1628 N		15TH	ST		READING, PA 19604
Current Resident	1709 N		15TH	ST		READING, PA 19604

<i>Name</i>	<i>HOUSE</i>	<i>DIR</i>	<i>STREET</i>	<i>TYPE</i>	<i>APT</i>	<i>City</i>
Fransico Javier	1501		UNION	ST		READING, PA 19604
Jose LUIS Hernandez	1705		OLIVE	ST		READING, PA 19604
Jack Taylor	1700		OLIVE	ST		READING, PA 19604
Elizabeth M Ray	1722		OLIVE	ST		READING, PA 19604
Vivian Romero	1724		OLIVE	ST		READING, PA 19604
John R Pankratz	1616		OLIVE	ST		READING, PA 19604
Joel N Askman	1615		OLIVE	ST		READING, PA 19604
Lori A Knockstead	1617		OLIVE	ST		READING, PA 19604
Anthony Calvaresi	1619		OLIVE	ST		READING, PA 19604
Justin Judd	1621		OLIVE	ST		READING, PA 19604
Kelly Moore	1701		OLIVE	ST		READING, PA 19604
John W Liggett	1707		OLIVE	ST		READING, PA 19604
Felipe Almonte	1713		OLIVE	ST		READING, PA 19604
Sandy Miranda	1715		OLIVE	ST		READING, PA 19604
Elaine M Allen	1719		OLIVE	ST		READING, PA 19604
Alma Placido	1721		OLIVE	ST		READING, PA 19604
Veronica Lepore	1723		OLIVE	ST		READING, PA 19604
Bryan Kutzer	1727		OLIVE	ST		READING, PA 19604
Gerald L Amole	1729		OLIVE	ST		READING, PA 19604
Alberto Cacicedo	1731		OLIVE	ST		READING, PA 19604
Ana G Castro	1726		OLIVE	ST		READING, PA 19604
James R Ulrich	1718		OLIVE	ST		READING, PA 19604
Joanne Ruchlewicz	1716		OLIVE	ST		READING, PA 19604
Ronald Peggues	1714		OLIVE	ST		READING, PA 19604
Jose Hidalgo	1712		OLIVE	ST		READING, PA 19604
Trinidad Fana	1710		OLIVE	ST		READING, PA 19604
Diana Mcdowall	1706		OLIVE	ST		READING, PA 19604
Rex W Smith	1614		OLIVE	ST		READING, PA 19604
Brett Fortley	1612		OLIVE	ST		READING, PA 19604
Beth L Gordon	1610		OLIVE	ST		READING, PA 19604
Current Resident	1608		OLIVE	ST		READING, PA 19604
Sunil Patel	1507		UNION	ST		READING, PA 19604
John Lafayette	1511		UNION	ST		READING, PA 19604
Lorna Munroe	1500		UNION	ST		READING, PA 19604
Stephen M Pauley	1708		OLIVE	ST		READING, PA 19604
Patricia H Hummel	1606		OLIVE	ST		READING, PA 19604
David Balmer	1620 N		15TH	ST		READING, PA 19604
Gregorio Zarzuela	1505		UNION	ST		READING, PA 19604
Mark Scott	1516		UNION	ST		READING, PA 19604
John Baver	1717		OLIVE	ST		READING, PA 19604
Francis Kline	1711		OLIVE	ST		READING, PA 19604
Thais Nunes	1703		OLIVE	ST		READING, PA 19604
Current Resident	1720		OLIVE	ST		READING, PA 19604
Current Resident	1728		OLIVE	ST		READING, PA 19604
Current Resident	1709		OLIVE	ST		READING, PA 19604
Current Resident	1725		OLIVE	ST		READING, PA 19604

CERTIFICATE OF SERVICE

I hereby certify that I have this 28th day of December, 2018, served a true and correct copy of the foregoing Motion to Reopen the Record, upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

Via Electronic and First Class Mail

Honorable Mary D. Long
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
malong@pa.gov

Mark C. Morrow, Esq.
Danielle Jouenne, Esq.
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
morrowm@ugicorp.com
jouenned@ugicorp.com

Devin T. Ryan, Esq.
Post & Schell, P.C.
17 N. Second Street, 12th Floor
Harrisburg, PA 17101-1601
dryan@postschell.com

David B. MacGregor, Esq.
Post & Schell, P.C.
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Rich Raiders, Esq.
Raiders Law
606 North 5th Street
Reading, PA 19601
rich@raiderslaw.com

Osmer S. Deming, Esq.
City of Reading
City Hall, Room 2-54
815 Washington Street
Reading, PA 19601
Osmer.Deming@readingpa.gov

Scott G. Hoh, Esq.
606 North 5th Street
Reading, PA 19601
scott@scotthohlaw.com



Charles E. Thomas, Jr. (PA ID #07262)