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Devin Ryan

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File #: 165082

January 7, 2019

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 City of Reading's Motion to Reopen the Record in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Mary D. Long
Certificate of Service

CERTIFICATE OF SERVICE
(Docket Nos. C-2015-2516051 and C-2016-2530475)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

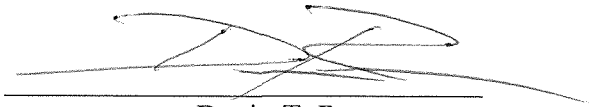
Osmer S. Deming, Esquire
City Hall, Room 2-54
815 Washington Street
Reading, PA 19601

Charles E. Thomas III, Esquire
Charles E. Thomas, Jr.
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101

Rich Raiders, Esquire
321 East Main Street
Annville, PA 17003

Scott Hoh, Esquire
Resolution Law Group
606 North 5th Street
Reading, PA 19601

Date: January 7, 2019


Devin T. Ryan

**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.	:	

**ANSWER OF UGI UTILITIES, INC. TO
THE CITY OF READING’S MOTION TO REOPEN THE RECORD**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to 52 Pa. Code §§ 5.61(e) and 5.571(c), UGI Utilities, Inc. (“UGI” or the “Company”) hereby submits its Answer to the Motion to Reopen the Record (“Motion”) filed by the City of Reading (“City”) on December 28, 2018, in the above-captioned proceeding.

Administrative Law Judge Mary D. Long (the “ALJ”) should deny the City’s Motion. The City incorrectly alleges that the customer notification letters sent by the Company in December 2018 to certain customers in the Heights Conservation District “directly contradict the statements made by UGI’s witness at the hearings and the supposed notification letter currently in use by UGI marked as UGI Exhibit CB-16.” (Motion ¶ 5)

As explained herein, the City’s Motion is entirely based on the City’s confusion of the several letters UGI sends before a betterment project. To be clear, the Company did in fact send customer notification letters that were substantially the same as UGI Exhibit CB-16 in November 2018. Per UGI witness Christopher Brown’s testimony, these letters are sent to customers approximately 30 days before the betterment projects take place, pursuant to 52 Pa. Code § 59.18(a)(2)-(3).

However, the letters the City wants to introduce as Post Closing Exhibit No. 1 are not the 30-day letters. These are follow-up letters that were sent to: (1) the customers who received the previous letters, to serve as an additional reminder of the upcoming project; and (2) non-customers, to notify them of the project and provide them with UGI's contact information if they want to switch to natural gas during the construction project.

In fact, UGI witness Brown testified about these follow-up letters at the evidentiary hearing. Specifically, he stated:

We also follow up those letters with more of a - - more project specific letter. It has a lot of the same language where they'll typically have a construction supervisor's name at the bottom, so now they have a point person, somebody they can call and contact in addition to our 800 number which was provided on the first letter.

(Tr. 286) Therefore, UGI witness Brown's testimony is entirely consistent with the follow-up letters attached to the City's Motion.

Thus, the City has completely failed to: (1) prove that there have been "material changes of fact or of law" that "have occurred since the conclusion of the hearing" or that the "public interest requires" reopening the record (52 Pa. Code § 5.571(b), (d)); and (2) demonstrate "good cause" for the admittance of this evidence (52 Pa. Code § 5.431(b)). Accordingly, the City's Motion should be denied.

In support thereof, UGI states as follows:

I. BACKGROUND

1. On November 25, 2015, CPHD filed a Formal Complaint at Docket No. C-2015-2516051 alleging UGI's meter location practices in the historic districts of Reading, PA violated the amended Section 59.18 and Section 59.33 of the Commission's regulations. (See CPHD

Complaint, ¶ 5) On December 15, 2015, UGI filed an Answer to CPHD's Complaint denying any regulatory violation.

2. On February 23, 2016, UGI received e-service of the City's Complaint. In its Complaint, the City alleged UGI violated the amended Section 59.18 and Section 59.33 of the Commission's regulations. (*See* City Complaint, Counts I and II) On March 14, 2016, UGI filed an Answer denying the material allegations in the City's Complaint and averring that its meter location practices are and have been consistent with the Commission's regulations.

3. These matters were consolidated for disposition.

4. On August 22 and 23, 2018, evidentiary hearings were held before the ALJ as scheduled in this matter, during which the parties presented their testimony and exhibits and conducted cross-examination.

5. By Interim Order dated December 11, 2018, the record was closed.

6. On December 28, 2018, the City filed a Motion to Reopen the Record to admit Post Closing Exhibit No. 1, which consisted of English and Spanish versions of a letter dated December 20, 2018, and a list of the names and addresses of the individuals who purportedly received this letter.

II. APPLICABLE LEGAL STANDARDS

7. The Commission's regulations specify that "at 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." 52 Pa. Code § 5.571(a).

8. Such a petition "must set forth clearly the facts claimed to constitute grounds requiring reopening of the proceeding, including material changes of fact or of law alleged to have occurred since the conclusion of the hearing." *Id.* § 5.571(b).

9. Further, “[t]he record may be reopened upon notification to the parties in a proceeding for the reception of further evidence if there is reason to believe that conditions of fact or of law have so changed as to require, or that the public interest requires, the reopening of the proceeding.” *Id.* § 5.571(d).

10. The Commission’s regulations also state that “[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.” *Id.* § 5.431(b).

III. ANSWER TO MOTION TO REOPEN THE RECORD

11. The City’s Motion should be denied because the City has completely failed to demonstrate that there have been material changes of fact or law since the record closed, that the public interest requires the reopening of the record, and that good cause exists for the admittance of the City’s Post Closing Exhibit No. 1.

12. The City incorrectly alleges that the customer notification letters sent by the Company in December 2018 to certain customers in the Heights Conservation District “directly contradict the statements made by UGI’s witness at the hearings and the supposed notification letter currently in use by UGI marked as UGI Exhibit CB-16.” (Motion ¶ 5)

13. The City’s plain error is confusing UGI’s 30-day customer notification letters (UGI Exhibit CB-16) with the Company’s follow-up letters (Post Closing Exhibit No. 1).

14. As UGI witness Brown testified, “in accordance with 52 Pa. Code § 59.18, UGI provides a letter notifying customers of the pending project at least 30 days in advance of a project beginning, with the exception of emergency work.” (UGI St. No. 1, p. 25, lines 21-23) At the evidentiary hearing, UGI’s 30-day customer notification letter, as revised in October 2017, was admitted as UGI Exhibit CB-16.

15. In addition, UGI witness Brown explained that the Company sends follow-up letters and explained their contents at the evidentiary hearing. Specifically, he testified:

We also follow up those letters with more of a - - more project specific letter. It has a lot of the same language where they'll typically have a construction supervisor's name at the bottom, so now they have a point person, somebody they can call and contact in addition to our 800 number which was provided on the first letter. (Tr. 286)

16. Here, UGI sent the 30-day customer notification letters to the customers listed in the City's Motion in November 2018. These letters were substantially the same as the example letter provided as UGI Exhibit CB-16. Attached hereto as **Attachment A** are copies of the 30-day letters sent to the addresses identified by the City in its Motion.¹

17. In contrast, the December 20, 2018 letters the City wants to introduce as Post Closing Exhibit No. 1 were the follow-up letters that were sent to: (1) the customers who received the previous letters, to serve as an additional reminder of the upcoming project; and (2) non-customers, to notify them of the project and provide them with UGI's contact information if they want to switch to natural gas during the construction project.

18. Therefore, the City's Motion does not demonstrate any contradiction with UGI witness Brown's testimony. To the contrary, the City has shown that UGI sends the follow-up letters to residents pursuant to the Company's procedures, as UGI witness Brown testified.

¹ The names of the recipients have been redacted in **Attachment A**. Further, other than 1608 Olive Street, the recipients identified as "Current Resident" in the City's lists were only sent the follow-up letters because they are non-UGI customers.

UGI also observes that the November 2018 letters in **Attachment A** have slightly different wording than UGI Exhibit CB-16. After the City filed its Motion, UGI witness Christopher Brown became aware that minor revisions to the standard 30-day customer notification letter were made in or around April 2018. However, as seen in **Attachment A**, the substance of the 30-day customer notification letters remains the same. Accordingly, there have been no material changes in fact since the record closed. Notwithstanding, UGI would not be opposed to: (1) the latest customer notification letters provided in **Attachment A** being admitted into the record; and (2) the record reflecting that the standard 30-day letter was revised in or around April 2018 to the version shown in **Attachment A**.

Moreover, as seen in **Attachment A**, UGI actually sent the 30-day customer notification letters to the customers identified in the City's Motion.

19. Thus, the City has entirely failed to establish that there have been material changes of fact or law since the record closed, that the public interest requires the reopening of the record, and that good cause exists for the admittance of the City's Post Closing Exhibit No. 1.

20. For these reasons, the ALJ should deny the City's Motion to Reopen the Record.

IV. CONCLUSION

WHEREFORE, UGI Utilities, Inc. respectfully requests that Administrative Law Judge Mary D. Long deny the City of Reading's Motion to Reopen the Record.

Respectfully submitted,



Mark C. Morrow (ID # 33590)
Chief Regulatory Counsel
Danielle Jouenne (ID # 306829)
Associate Counsel
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King of Prussia, PA 19406
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17 North Second Street
12th Floor
Harrisburg PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com

Dated: January 7, 2019

Attorneys for UGI Utilities, Inc.

ATTACHMENT “A”



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1614 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

You may request that UGI reconsider the decision to relocate your meter. Your request can be made online by visiting www.ugi.com, and clicking on the "Community" tab at the top of the page. On the Community page, click on "Infrastructure" item in the left column and select "Meter Relocation", and then click on the indicated link to access the form. Once the form is submitted, you will receive a confirmation of submission of your reconsideration request.

If you are a renter or do not own this property, UGI requests that you forward this letter to the property owner. Should you or the property owner have a question or concern regarding this matter, you may contact the UGI Call Center at the following number:

1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

UGI also wants you to know that the Company will conduct restoration efforts to areas affected by the project. This includes restoration of sidewalks, paved and planted areas impacted by the construction activity. **Restoration efforts will be conducted as soon as practicable following completion of the construction project.**

Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1622 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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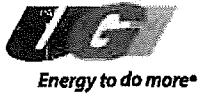
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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1703 N 15TH ST
READING, PA 19604

November 15, 2018

Dear ██████████:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI Intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1429 UNION ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1624 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1605 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Sincerely,

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UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1607 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Sincerely,

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1608 N 15TH ST
READING, PA 19604

November 15, 2018

Dear ██████████:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1609 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1611 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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If you are a renter or do not own this property, UGI requests that you forward this letter to the property owner. Should you or the property owner have a question or concern regarding this matter, you may contact the UGI Call Center at the following number:

1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

UGI also wants you to know that the Company will conduct restoration efforts to areas affected by the project. This includes restoration of sidewalks, paved and planted areas impacted by the construction activity. **Restoration efforts will be conducted as soon as practicable following completion of the construction project.**

Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1615 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1617 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1619 N 15TH ST
READING, PA 19604

November 15, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1621 N 15TH ST
READING, PA 19604

November 15, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1701 N 15TH ST
READING, PA 19604

November 15, 2018

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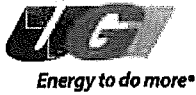
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1707 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
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[REDACTED]
1711 N 15TH ST
READING, PA 19604

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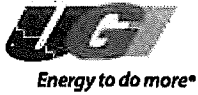
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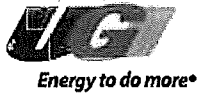
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1626 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
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[REDACTED]
1606 N 15TH ST
READING, PA 19604

November 15, 2018

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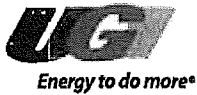
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[REDACTED]
1521 N 15TH ST
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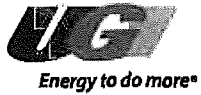
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November 15, 2018

Dear [REDACTED]:

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If you are a renter or do not own this property, UGI requests that you forward this letter to the property owner. Should you or the property owner have a question or concern regarding this matter, you may contact the UGI Call Center at the following number:

1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

UGI also wants you to know that the Company will conduct restoration efforts to areas affected by the project. This includes restoration of sidewalks, paved and planted areas impacted by the construction activity. **Restoration efforts will be conducted as soon as practicable following completion of the construction project.**

Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1517 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1515 N 15TH ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1501 N 15TH ST
READING, PA 19604

November 15, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1500 N 15TH ST
READING, PA 19604

November 15, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1504 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1508 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1510 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1514 N 15TH ST
READING, PA 19604

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1516 N 15TH ST
READING, PA 19604

November 15, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1518 N 15TH ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1428 AMITY ST
READING, PA 19604

November 15, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1430 AMITY ST
READING, PA 19604

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1512 N 15TH ST
READING, PA 19604

November 15, 2018

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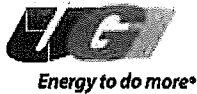
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
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[REDACTED]
1613 N 15TH ST
READING, PA 19604

November 15, 2018

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██████████
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UGI also wants you to know that the Company will conduct restoration efforts to areas affected by the project. This includes restoration of sidewalks, paved and planted areas impacted by the construction activity. **Restoration efforts will be conducted as soon as practicable following completion of the construction project.**

Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1616 N 15TH ST
READING, PA 19604

November 15, 2018

Dear ██████████:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 15, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

You may request that UGI reconsider the decision to relocate your meter. Your request can be made online by visiting www.ugi.com, and clicking on the "Community" tab at the top of the page. On the Community page, click on "Infrastructure" item in the left column and select "Meter Relocation", and then click on the indicated link to access the form. Once the form is submitted, you will receive a confirmation of submission of your reconsideration request.

If you are a renter or do not own this property, UGI requests that you forward this letter to the property owner. Should you or the property owner have a question or concern regarding this matter, you may contact the UGI Call Center at the following number:

1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1615 PALM ST
READING, PA 19604

November 15, 2018

Dear [REDACTED]:

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1523 N 15TH ST
READING, PA 19604

November 15, 2018

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1501 UNION ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 29, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1705 OLIVE ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1700 OLIVE ST
READING, PA 19604

November 29, 2018

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1722 OLIVE ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1724 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1616 OLIVE ST
READING, PA 19604

November 29, 2018

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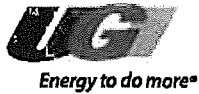
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1615 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1617 OLIVE ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1619 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1621 OLIVE ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1701 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1707 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1713 OLIVE ST
READING, PA 19604

November 29, 2018

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1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

UGI also wants you to know that the Company will conduct restoration efforts to areas affected by the project. This includes restoration of sidewalks, paved and planted areas impacted by the construction activity. **Restoration efforts will be conducted as soon as practicable following completion of the construction project.**

Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1715 OLIVE ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1719 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1721 OLIVE ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1723 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1727 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1729 OLIVE ST
READING, PA 19604

November 29, 2018

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Post Office Box 13009
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██████████
1731 OLIVE ST
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UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1726 OLIVE ST
READING, PA 19604

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Post Office Box 13009
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[REDACTED]
1718 OLIVE ST
READING, PA 19604

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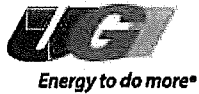
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[REDACTED]
1716 OLIVE ST
READING, PA 19604

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1706 OLIVE ST
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Thank you for your time and attention to this notification letter.

Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1612 OLIVE ST
READING, PA 19604

November 29, 2018

Dear ██████████:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 29, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI Intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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If you are a renter or do not own this property, UGI requests that you forward this letter to the property owner. Should you or the property owner have a question or concern regarding this matter, you may contact the UGI Call Center at the following number:

1-800-276-2722

You may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services. Contact information for the Bureau of Consumer Services is:

Bureau of Consumer Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, G-M East
Harrisburg, PA 17120
800-692-7380

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1610 OLIVE ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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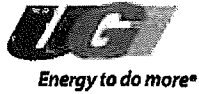
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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

Resident
1608 OLIVE ST
READING, PA 19604

November 29, 2018

Dear Resident:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 29, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. As part of this project, **UGI Intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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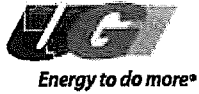
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Pennsylvania Public Utility Commission
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Harrisburg, PA 17120
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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1507 UNION ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

This letter notifies you that work will be performed on the natural gas facilities in your area and may require relocation of your gas meter on or after November 29, 2018. The purpose of this work is to ensure the safe and reliable delivery of energy through our system. **As part of this project, UGI intends to move natural gas meter sets located inside of residences to a position outside the dwelling, but if you are located in federal, state or local historic area you may request consideration of an inside location for your meter.**

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Sincerely,

UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1511 UNION ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1500 UNION ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1708 OLIVE ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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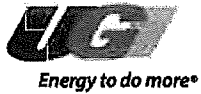
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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1606 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1620 N 15TH ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1505 UNION ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc



UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1516 UNION ST
READING, PA 19604

November 29, 2018

Dear [REDACTED]:

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1717 OLIVE ST
READING, PA 19604

November 29, 2018

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225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

██████████
1711 OLIVE ST
READING, PA 19604

November 29, 2018

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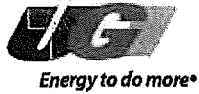
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UGI Utilities, Inc.
225 Morgantown Road
Post Office Box 13009
Reading, PA 19612-3009
1-800-276-2722

[REDACTED]
1703 OLIVE ST
READING, PA 19604

November 29, 2018

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UGI Utilities, Inc


**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 Senior 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: 1/4/19


Christopher Brown