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August 25, 2021

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

Re: Dominic Raneri v. UGI Utilities, Inc.
Complaint Docket No. C-2021-3027378

Dear Ms. Chiavetta:

Enclosed is an electronically filed copy of UGI Utilities, Inc.'s Motion for Consolidation. A copy of the document has been served on the Complainant.

Sincerely,



Larry R. Crayne

enclosure

cc: Dominic Raneri
555 S. 18th Street
Reading, PA 19606

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Dominic Raneri,
Complainant,

Complaint Docket
No. C-2021-3027378

VS.

UGI Utilities, Inc.,
Respondent.

Motion for Consolidation

And Now comes Respondent, UGI Utilities, Inc. (UGI Utilities), pursuant to 52 *Pa. Code*, Section 5.103 (a) and (b) and files the following Motion for Consolidation:

1. On or about January 21, 2021, Complainant filed the above captioned Formal Complaint with the Commission regarding "parking restrictions" posted in the vicinity of Complainant's residence at 555 South 18th Street, Reading, PA.
2. The Complaint was electronically served on UGI Utilities on July 21, 2021.
3. On August 10, 2021, UGI Utilities filed an Answer to Complaint Docket No. C-2021-3027378 with the Secretary of the Commission. The answer averred that parking restrictions in the City of Reading, PA are regulated by the Reading City Parking Authority, and, therefore, UGI Utilities was complying with the requirements of the Reading City Parking Authority.
4. Complainant previously filed a complaint against UGI Energy Services, LLC at Docket No. C-2021-3025226.
5. A hearing was held on Complaint Docket No. C-2021-3025226 on July 28, 2021. Thereafter, an Order Granting Continuance dated August 2, 2021 was issued that provided for the matter to be continued to allow UGI Utilities to participate in the hearing of the Complaint.
6. Because UGI Utilities is a Commission jurisdictional utility and the complaints involve similar factual allegations, there is no reason why the Complaint at Docket No. C-2021-3027378 cannot be consolidated with the Complaint filed at Docket No. C-2021-3025226. However, UGI Utilities notes that UGI Energy Services, LLC is not a Commission jurisdictional utility. Therefore, the Complaint against UGI Energy Services, LLC should be dismissed.
7. UGI Utilities is advised by counsel that UGI Energy Services, LLC supports this Motion for Consolidation.

Wherefore, UGI Utilities moves that the two complaints at C-2021-3027378 and C-2021-3025226 be consolidated to the extent necessary for the purpose of considering relevant and material jurisdictional matters and the scheduling of one telephonic hearing before the Commission.

Notice to Plead

To: Dominic Raneri:

You are hereby notified to file a written response to the above Motion for Consolidation within twenty (20) days from service hereof or a judgment may be entered against you. The response must be mailed to the Secretary of the Public Utility Commission:

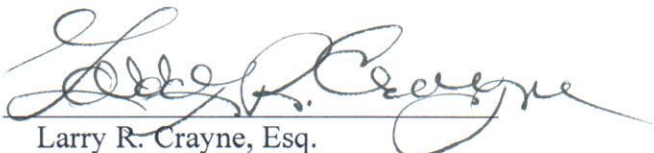
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

A copy of your response must also be provided to:

Larry R. Crayne, PC
Attorney at Law
238 Johnston Road
Pittsburgh, PA 15241
412-425-4029
lrcrayne@comcast.net

Frank Markle, Esq.
UGI Energy Service, LLC
UGI Corporation
460 N. Gulph Road
King of Prussia, PA 19406
484.459.8153
marklef@ugicorp.com

Respectfully submitted,
UGI Utilities, Inc.

By: 
Larry R. Crayne, Esq.

VERIFICATION

I, Amy Wynn, Senior Compliance Representative for UGI Utilities, Inc., hereby state that the facts set forth above are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C. S., Section 4904 (relating to unsworn falsification to authorities).

Date: 8-25-2021

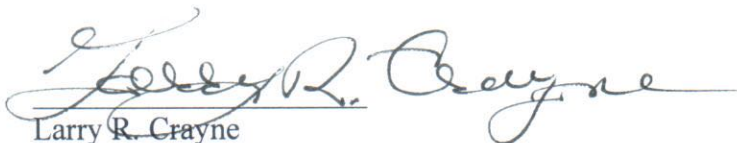
Amy K. Wynn
Amy Wynn
Senior Compliance Representative
UGI Utilities, Inc.

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (b) (1) (relating to service by a participant).

Dominic Raneri
555 S. 18th Street
Reading, PA 19606
ranerii@aol.com

Dated this 25th day of Aug, 2021



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.