

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lcrayne@adelphia.net

(412) 831-5462
(412) 425-4029

October 18, 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 Nos. C-2021-302-5226 and C-2021-3027378

Dear Ms. Chiavetta:

Enclosed please find an Answer to Motion to Compel in the above matter.

Sincerely,


Larry R. Crayne

enclosure

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

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Dominic Raneri,
Complainant,

Complaint Docket
Nos. C-2021-3025226 and
C-2021-3027378

VS.

UGI Utilities, Inc.,
Respondent.

Answer to Motion to Compel

AND NOW comes Respondent, UGI Utilities, Inc. (UGI), pursuant to 52 Pa. Code, Section 5.342 (g) (1), and files this Answer to Complainant's Motion to Compel answers to Interrogatories submitted by Complainant.

By way of background, on October 4, 2021, Complainant filed a *Petition to Compel Disclosure* in Docket Nos. C-2021-3025226 and C-2021-3027378. Also on October 4, 2021, Administrative Law Judge (ALJ) Charece Collins issued an email to the Parties indicating that Mr. Raneri's October 4, 2021 Petition to Compel would be treated as interrogatory requests for which UGI had 20 days to respond (i.e., by October 25, 2021). On October 13, 2021, UGI filed *Objections to Interrogatories* of Complainant. UGI provided 5 objections based, in part, on relevance, broadness, repetitiveness, standing and confidentiality. Also on October 13, 2021, Complainant submitted an email response to UGI's Objections to Interrogatories in which he seeks to compel UGI's response to his interrogatories. While Complainant has not styled his email response of October 13, 2021 as a motion to compel, UGI will treat the email response as such under 52 Pa. Code 5.342 (g). Therefore, UGI hereby files this Answer to Complainant's Motion to Compel.

As UGI stated in its Objections to Complainant's Interrogatories, expanding the Interrogatories' scope beyond the area that logically would impact Complainant's street is not necessary or relevant for Complainant's case and controversy. The Complaint regards a parking restriction on South 18th Street in Reading while UGI was performing a gas installation project on his street. As stated in UGI's Objections to the Interrogatories, a copy of which was provided to your Honor by Complainant, expansion of the discovery request beyond Complainant's street (and beyond the specific installation project) would expand the scope of this Complaint beyond Complainant's specific case in controversy.

Complainant herein has no standing or interest in expanding this Complaint beyond the immediate vicinity of his street. The demand will make this matter burdensome and complicated for UGI and the Commission. Expansion of this matter to include the entire City of Reading

could potentially require UGI to disclose privileged, confidential and/or proprietary information. For example, disclosure of the work orders could reveal to a trained individual key information regarding the location of UGI's main gas supply lines, key valves and other facilities necessary for supplying natural gas service to the City of Reading. Disclosure of such information for the entire City of Reading would require UGI to disclose sensitive information regarding the natural gas supply system and the specific locations of customer service addresses in the City of Reading. The information is sensitive because UGI considers this level of information protected as Confidential Security Information pursuant to 52 Pa. Code § 102 et al. Moreover, unqualified members of the public should not approach any of this equipment for reasons of public safety.

Therefore, UGI will respond only to matters relevant and material to the work performed in the immediate vicinity of Complainant's street during the time periods of March 8, 2021 through and including March 19, 2021 and June 24, 2021 through and including June 25, 2021. In the event Complainant's Interrogatories are not limited to the area of Complainant's street and are deemed to include the entire City of Reading, UGI requests that the information be provided subject to a protective order preventing the disclosure of the information to the public and for the information to be used only for the limited purpose of this complaint.

Wherefore, UGI moves that this Motion to limit the scope of Complainant's Interrogatories to the area that logically would impact Complainant's access to his street be granted and that Complainant only be provided with relevant and material information in the immediate vicinity of Complainant's residence at 555 S. 18th Street, Reading, PA during the time periods of March 8, 2021 through and including March 19, 2021 and June 24, 2021 through and including June 25, 2021.

Respectfully submitted,
UGI Utilities, Inc.

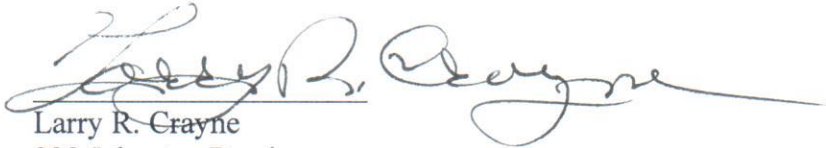
By: 
Larry R. Crayne

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 19th day of Oct, 2021



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.