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Garrett P. Lent

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File #: 199436

December 22, 2023

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

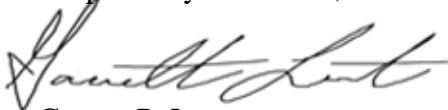
**Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement  
v. UGI Utilities, Inc. - Gas Division  
Docket No. C-2023-3044989**

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Dear Secretary Chiavetta:

Enclosed for filing is the Unopposed Motion of UGI Utilities, Inc. - Gas Division (“UGI Gas” or the “Company”) for Extension of Time to File an Answer in the above-referenced proceeding. As explained therein, UGI Gas respectfully requests a twenty-three (23) day extension (i.e., until January 31, 2024) to submit its Answer to the above-captioned Formal Complaint. The Company’s request is unopposed. Copies of this Motion will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/dmc  
Enclosure

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

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 ONLY**

Colby B. Widdowson, Prosecutor  
Michael L. Swindler, Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
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Harrisburg, PA 17120  
[mwindler@pa.gov](mailto:mwindler@pa.gov)  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

Date: December 22, 2023



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Garrett P. Lent

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2023-3044989
	:	
UGI Utilities, Inc. – Gas Division	:	
	:	
Respondent.	:	

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**UNOPPOSED MOTION OF UGI UTILITIES, INC. – GAS DIVISION FOR  
EXTENSION OF TIME TO FILE AN ANSWER**

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Pursuant to 52 Pa. Code § 1.15(a)(1), UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”), by its counsel, hereby requests that the Pennsylvania Public Utility Commission (“Commission”) extend the current due date to file an Answer to the above-captioned Formal Complaint of the Commission’s Bureau of Investigation and Enforcement (“I&E”) by twenty-three (23) days (e.g., from January 8, 2024 to January 31, 2024). In support thereof, UGI Gas represents as follows:

1. On December 19, 2023, UGI Gas was served with the above-captioned Formal Complaint. Under the Commission’s regulations, UGI Gas’s Answer to the Formal Complaint would be due on January 8, 2024.

2. The Formal Complaint arises from an incident that occurred on December 25, 2020, in Swiftwater, PA.

3. In order to prepare its Answer, UGI Gas must seek and obtain input from its employees, agents and experts. However, there are several intervening holidays between the date the Formal Complaint was served upon UGI Gas and the date that UGI Gas must file its Answer.

4. Counsel for UGI Gas contacted counsel for I&E to determine whether I&E would object to an extension of time to file an Answer to the Formal Complaint, based upon the proximity of the upcoming holidays. Counsel for I&E indicated that I&E does not oppose a twenty-three (23) day extension, which would make UGI Gas's Answer to the Formal Complaint due on January 31, 2024.

5. Section 1.15(a)(1) of the Commission's regulations states:

...whenever under this title or by order of the Commission, or notice given thereunder, an act is required or allowed to be done at or within a specified time, the time fixed or the period of time prescribed may, by the Commission, the presiding officer or other authorized person, for good cause be extended upon motion made before expiration of the period originally prescribed or as previously extended.

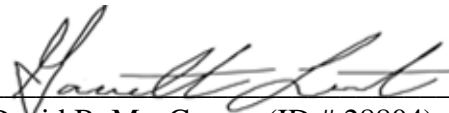
52 Pa. Code § 1.15(a)(1). As such, the Commission, the presiding officer or other authorized person, may grant a request for an extension of time, prior to the originally prescribed deadline, upon a showing of "good cause."

6. Good cause for the requested extension exists because it will obviate the need for UGI Gas to disrupt anticipated leave and/or holiday plans for its employees, agents and experts to prepare its Answer. In addition, this Motion is UGI Gas's first request for an extension of time in this matter, and UGI Gas's request is not opposed by I&E.

7. For these reasons, UGI Gas submits good cause exists for the requested twenty-three day extension and that it will help secure the just, speedy and efficient determination of the above-captioned matter.

WHEREFORE, for all the foregoing reasons, UGI Utilities, Inc. – Gas Division requests that Pennsylvania Public Utility Commission, the Presiding Officer or another authorized person grant this Motion and extend the time for UGI Utilities, Inc. – Gas Division to file an Answer to the above-captioned Formal Complaint until January 31, 2024.

Respectfully submitted,



Michael S. Swerling (ID # 04748)  
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Date: December 22, 2023

*Counsel for UGI Utilities, Inc. – Gas Division*