
Peter J. Kramer

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File #: 205630

May 9, 2024

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: Sarah Aed v. UGI Utilities, Inc. – Gas Division
Docket No. C-2024-3047793**

Dear Secretary Chiavetta:

Attached please find the Motion of UGI Utilities, Inc. – Gas Division to Convert Evidentiary Hearing to a Prehearing Conference for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Peter J. Kramer

PJK/dmc
Attachments

cc: The Honorable F. Joseph Brady (*c/o pmcneal@pa.gov*)
Certificate of Service

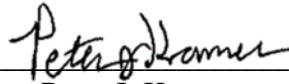
CERTIFICATE OF SERVICE

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 EMAIL AND FIRST-CLASS MAIL

Sarah Aed
67 Lackawanna Ave
Swoyersville, PA 18704
sarahaed@gmail.com

Date: May 9, 2024



Peter J. Kramer

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sarah Aed,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047793
	:	
UGI Utilities, Inc. – Gas Division,	:	
	:	
Respondent.	:	

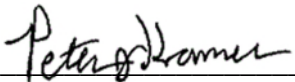
NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION WITHIN (20) DAYS AFTER THE DATE OF SERVICE OF THIS NOTICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR ANSWER SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Dated: May 9, 2024



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Counsel for UGI Utilities, Inc. – Gas Division

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sarah Aed,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047793
	:	
UGI Utilities, Inc. – Gas Division,	:	
	:	
Respondent.	:	

**MOTION OF UGI UTILITIES, INC. – GAS DIVISION
TO CONVERT HEARING TO PREHEARING CONFERENCE**

TO ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:

UGI Utilities, Inc. – Gas Division (“UGI Gas” or “Company”) hereby files this Motion pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and requests that the evidentiary hearing scheduled for June 4, 2024, for the above-captioned Complaint be converted to a prehearing conference. Prior to filing the instant Motion, counsel for UGI Gas contacted Sarah Aed (“Complainant”) about the proposed conversion to a prehearing conference. The Complainant does not oppose the request.

In support of the instant Motion, UGI Gas states as follows:

I. MOTION

1. UGI Gas is a “public utility” and a “natural gas distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2202, subject to the regulatory jurisdiction of the Commission.

2. UGI Gas provides natural gas distribution service to more than 650,000 customers, located primarily in south, central, and northeastern Pennsylvania.

3. On March 27, 2024, UGI Gas was served with the above-captioned Complaint. In the Complaint, the Complainant states she is “filing a formal complaint of the [Commission’s] allowance of UGI’s weather normalization rate fee being added to [the Complainant’s] monthly bill.” (*See* Complaint ¶¶ 4-5.)

4. On April 16, 2024, UGI Gas timely filed an Answer and New Matter to the Complaint, admitting in part and denying in part the factual basis of the Complainant’s allegations. Also on April 16, 2024, the Company filed a Preliminary Objection.

5. On April 18, 2024, a Telephonic Hearing Notice was issued by the Commission scheduling an evidentiary hearing for 10:00 a.m., June 4, 2024. On May 2, 2024, Administrative Law Judge F. Joseph Brady issued a Prehearing Order for the Telephonic Hearing.

6. The instant litigation involves the Company’s Weather Normalization Adjustment (“WNA”), which is a technical ratemaking mechanism that was approved as a five-year pilot program by the Commission in an Order entered on September 15, 2022, as part of the resolution of the Company’s most recent base rate case proceeding.

7. Depending on the scope of the instant proceeding, UGI Gas anticipates that it may need to present detailed, technical, and/or expert testimony about the design and reasonableness of the WNA at issue, as well as the basis for the data and calculations used to apply the WNA to the Complainant’s bills.

8. By converting the presently scheduled evidentiary hearing into a Prehearing Conference, the parties will be afforded the opportunity to discuss the issues to be litigated, the litigation schedule, potential witnesses, and other procedural guideposts.

9. Additionally, the requested prehearing conference will enable the parties to have productive discussions about potentially entering into factual stipulations, narrowing the scope of issues in this case, or both, which would reduce the length of the evidentiary hearing.

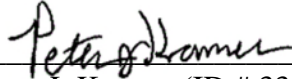
10. UGI Gas sought and obtained the non-opposition of the Complainant before submitting this Motion.

11. For these reasons, UGI Gas herein requests to convert the hearing scheduled for June 4, 2024, to a prehearing conference.

II. CONCLUSION

WHEREFORE, UGI Utilities, Inc. – Gas Division respectfully requests that the motion to convert the telephonic evidentiary hearing scheduled in the above-captioned proceeding for June 4, 2024, to a prehearing conference, be granted.

Respectfully submitted,



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Dated: May 9, 2024

Counsel for UGI Utilities, Inc. – Gas Division