

COMMONWEALTH OF PENNSYLVANIA



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March 3, 2025

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission v.
UGI Utilities, Inc. – Gas Division; Docket No.:
R-2024-3052716

Dear Secretary Chiavetta:

Attached for electronic filing, please find the Office of Consumer Advocate's Prehearing Conference Memorandum in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby

Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
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Enclosures

cc: The Honorable Mark A. Hoyer (email only: mhoyer@pa.gov)
The Honorable Charece Z. Collins (email only: charcollin@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3052716
	:	
UGI Utilities, Inc. – Gas Division	:	
	:	

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 3rd day of March 2025.

SERVICE BY E-MAIL ONLY

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Dated: March 3, 2025

/s/ Christy M. Appleby
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2024-3052716, <i>et al.</i>
	:	
UGI Utilities, Inc. – Gas Division	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. Section 333, and in response to the Prehearing Conference Order issued by Deputy Chief Administrative Law Judge Mark A. Hoyer (Deputy Chief ALJ Hoyer) and Administrative Law Judge Charece Z. Collins (ALJ Collins) in the above-captioned matter, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On January 27, 2025, UGI Utilities, Inc. - Gas Division (UGI Gas or Company) filed Supplement No. 55 to UGI Tariff Gas - Pa. P.U.C. Nos. 7 and 7S to become effective March 28, 2025, which proposed changes in rates, rules, and regulations calculated to produce \$110.395 million, an increase of 9.7%, in additional annual revenues. More specifically, the Company is proposing to allocate approximately \$83.1 million, or 75.3% of the proposed increase, to the residential customer class. The Company produces this result, in part, by increasing the average residential monthly customer charge by \$4.95, from \$15.00 to \$19.95, or by 33.0%

The Company proposes a return on equity of 11.20% resulting in an overall rate of return of 8.42%, in conjunction with an equity-rich capital structure of 54% equity and 46% debt. Additionally, the filing requests approval of a continued weather normalization adjustment (WNA).

The Company is engaged in the business of furnishing natural gas to approximately 688,591 residential, commercial, and industrial customers in over 45 counties throughout Pennsylvania.

On February 7, 2025, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance. Also on February 7, 2025, the Office of Small Business Advocate (OSBA) filed a Formal Complaint, Public Statement, and Notice of Appearance. On or about January 28, 2025, the Commission's Bureau of Investigation and Enforcement (I&E) filed a Notice of Appearance. On February 13, 2025, Commission on Economic Opportunity (COE) filed a petition to intervene. On February 18, 2025, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a petition to intervene and answer. Also on February 18, 2025, the Retail Energy Supply Association and Shipley Choice, LLC d/b/a Shipley Energy (RESA/Shipley) filed a Petition to Intervene. It is believed and therefore averred that, as of this writing, eleven (11) consumers have filed formal rate complaints in this proceeding, and twenty-five (25) consumers have filed comments.

On February 20, 2025, the Commission issued an Order initiating an investigation into the lawfulness, justness and reasonableness of the proposed rate increase in this filing, in addition to the Company's existing rates, rules, and regulations, and suspended the effective date of Supplement No. 55 until October 28, 2025, by operation of law. The case was assigned to the

Office of Administrative Law Judge (OALJ) and further assigned to Deputy Chief ALJ Hoyer and ALJ Collins. A Prehearing Conference is scheduled for Tuesday, March 4, 2025.

II. ISSUES AND SUB-ISSUES

Based upon a preliminary analysis of the Company's filing, the OCA has compiled a list of issues that it anticipates will be included in its investigation of this rate request. It is anticipated that other issues may arise and may be pursued once the answers to all of the OCA's data requests have been received and analyzed.

The OCA has served eleven (11) sets of data requests to date. Upon receipt of the answers to all of its data requests, the OCA may then be able to narrow the scope of additional information requests. Once the discovery process has been completed, the OCA will serve direct testimony which will set forth the specific issues that the OCA will address in this proceeding. At that time, the OCA will also be able to make and to quantify its specific recommendations.

The following sets forth the issues that the OCA anticipates it may raise at this time:

A. Rate of Return

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company. Also, the OCA will carefully examine the Company's methodologies and supporting data used to develop its final cost of common equity claim.

2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.

4. The OCA will examine whether any company-specific adjustments proposed by the Company are justified.

5. The OCA will examine the impact of Company's proposed alternative ratemaking mechanisms on its risk profile.

6. The OCA will also examine the Company's proposed twenty (20) basis point

performance management adder.

B. Rate Base/ Measure of Value

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.
2. The OCA will review the Company's claim for plant additions during the FTY and FPFTY.
3. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.
4. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.
5. The OCA will examine the Company's proposal to include unamortized balances in rate base.
6. The OCA will examine the Company's claim for materials and supplies.
7. The OCA will examine the Company's calculation and amount of cash working capital.
8. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*
9. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.
10. The OCA will examine the reasonableness of the Company's proposed AFUDC for land held for future use.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.
2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.
3. The OCA will examine whether the projected number of customers in the FTY and FPFTY are reasonable and accurate.
4. The OCA will examine whether the Company's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.

5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.

6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.

7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.

8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.

9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.

10. The OCA will examine the reasonableness of the Company's proposed purchased power expense claims.

11. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.

12. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.

13. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.

14. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.

15. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.

16. The OCA will examine the justness and reasonableness of the Company's claims for service company expenses, including the allocated expenses of affiliated interests.

17. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

18. The OCA will examine any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.

19. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.

20. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).

2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.

3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.

4. The OCA will examine the Company's level of PURTA and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs/ Alternative Ratemaking

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increase among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.

2. The OCA will examine Company's cost of service study, including the methodology used and the reasonableness of the allocations.

3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges. This includes the Company's proposed continued application of Company's Weather Normalization Adjustment (WNA), which may be contrary to the provisions of prior Commission orders; and otherwise, may be contrary to sound ratemaking principles and public policy.

4. The OCA will examine all other cost allocation and rate design proposals.

F. Depreciation

1. The OCA will examine the Company's depreciation study, including the proposed service lives, net salvage rates, and depreciation rate calculations to determine if they are reasonable.

2. The OCA will analyze the depreciation rates based upon the actuarial analysis to determine if any modifications are necessary.

G. Low-Income Programs

1. The OCA will analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.
2. The OCA will assess the impact of the Company's proposed rate increase on universal service, including the overall costs of the Company's customer assistance programs as affected by the Company's rate design.
3. The OCA will examine how Company's proposed rate increase, rate structure and proposed new alternative ratemaking and new surcharges will affect low-income and/or low-usage customers.
4. The OCA will review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.
5. The OCA will review the Company's affordability analysis.

H. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.
2. The OCA will investigate the quality of service complaints by the Company's customers.

I. Customer Service

1. The OCA will review the Company's consumer protection policies and programs in order to ensure compliance with the Commission's regulations.
2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.
3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.
4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.
5. The OCA will examine the Company's request for a management performance adder to its return on equity and rate of return in light of the Company's customer service performance.
6. The OCA will examine the Company's response to the most recent Commission Management Audit.

J. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.
2. The OCA will investigate to ensure that the Company is complying with all prior orders and settlement provisions.
3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding: OCAUGI2025@paoca.org.

Revenue Requirement / Accounting

Jennifer Rogers
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044

Cost of Service / Rate Structure/ Rate Design
and WNA

Jared Geiger
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, Maryland 21044

Rate of Return / Cost of Capital /
Capital Structure/Depreciation

David J. Garrett
Resolve Utility Consulting PLLC
101 Park Avenue
Suite 1125
Oklahoma City, OK 73102

Affordability of Service / Low-Income
Customers Assistance Programs

Roger Colton
Fisher, Sheehan and Colton
34 Warwick Road
Belmont, MA 02478

The OCA specifically reserves the right to call additional witnesses as may be necessary. As soon as the OCA has determined whether an additional witness or witnesses will be necessary for any portion of its case, the OCA will promptly notify Deputy Chief ALJ Hoyer and ALJ Collins and all parties of record.

IV. PROPOSED SCHEDULE

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

Public Input Hearings	Week of April 7, 2025
Other Parties' Direct Testimony	April 18, 2025
Other Parties' Supplemental Direct Testimony Limited to Public Input Hearings	In the event that public input hearings are held the week of April 14 th or after, Supplemental Direct Testimony may be needed. If needed, OCA proposes that it be submitted on the Rebuttal Testimony deadline.
Rebuttal Testimony (all parties and all issues)	May 16, 2025 at noon
Surrebuttal Testimony (all parties and all issues)	May 30, 2025
Written Rejoinder Outline (by noon)	June 5, 2025 (by 4:00 pm)
Evidentiary Hearings (telephonic)	June 9, 2025 – June 10, 2025
Main Briefs	June 27, 2025
Reply Briefs	July 9, 2025

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below.

Christy M. Appleby, Senior Assistant Consumer Advocate
Jacob D. Guthrie, Assistant Consumer Advocate
Katherine “Katie” Kennedy, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCAUGI2025@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA’s group email address will provide the emailed materials to all members of the OCA team including the consultants listed above.

The OCA also requests that the ALJs instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

For the purposes of the Prehearing Conference, Ms. Appleby will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference (March 4, 2025). The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

- A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.
- B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that both in-person and telephonic public input hearings be held for the Company's customer base impacted by this rate filing. The City of Scranton requested public input hearings to take place in the City of Scranton, as Mayor Cagnetti and City Council President Smurl have stated that City Officials have received substantial public interest in this rate increase, per their letter dated February 10, 2025.

In a letter to Commission Chairman DeFrank dated February 21, 2025, Representative Jim Haddock also requested a public input hearing to take place in Luzerne and Lackawanna Counties. On a follow up call via telephone, Representative Haddock suggested public input Hearings be held at Pittston Area High School (5 Stout St, Yatesville, PA 18640) with a secondary recommendation of hosting public input Hearings in Wilkes-Barre, PA.

On or about February 27, 2025, a consumer called the Office of Consumer Advocate and requested public input hearings take place in Reading, PA, as well.

Attached as Appendix A is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJs). The OCA requests the following:

A. Given the size of the customer base and service territory, a total of at least four (4) Public Input Hearings be held, with two in-person hearings and two telephonic hearings.

B. The in-person public input hearings include a combination of daytime and evening hearings at location/location(s) in Lackawanna and/or Luzerne Counties with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

X. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Alternative Ratemaking, Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and precede the Conclusion. The OCA also recommends removing any "Fair Value" heading from the Rate Base section. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

XI. CONCLUSION

The OCA respectfully requests that the presiding ALJ grant the requests contained herein.

Respectfully submitted,

/s/ Christy M. Appleby

Christy M. Appleby, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
Email: CAppleby@paoca.org

Counsel for:
Darryl A. Lawrence
Interim Acting Consumer Advocate

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Dated: March 3, 2025

Jacob D. Guthrie, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334367
Email: JGuthrie@paoca.org

Katherine “Katie” Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
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OCA APPENDIX A
NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For UGI Utilities, Inc. – Gas Division Rate Increase Requests

Docket Nos. R-2024-3052716, *et al.*

The Pennsylvania Public Utility Commission (PUC) will conduct four (4) Public Input Hearings concerning the general rate increase requests filed by UGI Utilities, Inc. – Gas Division on January 27, 2025, seeking to increase natural gas distribution rates by \$110.395 million per year. The in-person and telephonic hearings will be held at the following times and places:

**Presiding Officers: Deputy Chief Administrative Law Judge Mark A. Hoyer and
Administrative Law Judge Charece Z. Collins**

IN-PERSON PUBLIC INPUT HEARINGS
Pre-registration is not required.

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS
Pre-registration is [encouraged/required]. Read below.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by e-mail at [e-mail address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please e-mail them to the PUC Judge's Legal Assistant, [name], at [e-mail address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by e-mail at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

The Pennsylvania Office of Small Business Advocate (OSBA) is an independent state agency that represents the interests of small business consumers with 1-250 employees and which receives public utility service under a small commercial, small industrial, or small business rate classification. Please contact the OSBA if you are a small business owner/representative and have questions or need help with this proceeding: by email osba@pa.gov or telephone (717) 783-2525.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
 - A. Plant in Service
 - B. Depreciation Reserve
 - C. Additions to Rate Base
 - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
 - A. Cost of Service Study
 - B. Revenue Allocation
 - C. Rate Design/ Tariff Structure
 - D. Summary and Alternatives
- X. Alternative Ratemaking
- XI. Customer Service / Quality of Service
- XII. Customer Assistance Programs
- XIII. Tariff Issues (Not Briefed Above)
- XIV. Miscellaneous Issues
- XV. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate