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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; **PREHEARING CONFERENCE  
MEMORANDUM OF THE RETAIL ENERGY SUPPLY ASSOCIATION  
AND SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of The Retail Energy Supply Association and Shipley Choice, LLC d/b/a Shipley Energy (“RESA/Shipley”) in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Stewart", is written over a large, stylized blue scribble.

Todd S. Stewart  
*Counsel for The Retail Energy Supply  
Association and Shipley Choice, LLC d/b/a  
Shipley Energy (“RESA/Shipley”)*

TSS/jld

Enclosure

cc: Administrative Law Judge Mark A. Hoyer (via electronic mail – [mhoyer@pa.gov](mailto:mhoyer@pa.gov))  
Administrative Law Judge Charece Z. Collins (via electronic mail – [charcollin@pa.gov](mailto:charcollin@pa.gov))  
Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

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Todd S. Stewart

DATED: March 3, 2025

**BEFORE  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING CONFERENCE MEMODANDUM  
OF THE RETAIL ENERGY SUPPLY ASSOCIATION  
AND SHIPLEY CHOICE, LLC**

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**TO THE HONORABLE ADMINISTRATIVE LAW JUDGES MARK A. HOYER AND  
CHARECE Z. COLLINS:**

NOW COME, the Retail Energy Supply Association (“RESA”), and Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”)(collectively “RESA/Shipley”), by and through its counsel, HMS Legal LLP, and hereby submits this Prehearing Conference Memorandum in compliance with the Prehearing Conference Order issued February 25, 2025 (“Order”), in the above-captioned matter. In the Order, the Presiding Administrative Law Judges (“ALJs”) required that the Parties address several subjects, listed below.

The fundamental issue that RESA/Shipley intend to address, is the lack of communication from UGI on a number of critical issues involved in UGI’s service to Natural Gas Suppliers (“NGS”) in UGI’s service territory which in turn impacts NGS’ service to their customers. RESA/Shipley intend to address these, and other issues as discussed more completely below.

**A. A PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

RESA/Shipley will endeavor to conduct discovery as early in the proceeding as possible and will make good faith attempts to resolve any disputes informally. Moreover, RESA/Shipley agree in advance to the discovery modifications typically proposed by the OCA in rate proceedings.

**B. POSSIBILITY OF SETTLEMENT**

RESA/Shipley is willing to engage in settlement discussions with any party on any relevant issue.

**C. ISSUES**

The primary issue is the lack of communications from UGI. There has been a lack of accurate, timely and necessary communication regarding such critical issues as delivery interruptions, and curtailments that have impacted customers without suppliers being made aware. In a related matter, UGI's non-delivery penalties are among the highest of any NGDC, and yet UGI has been failing to provide appropriate notice to allow NGSs to address such issues. This list may be adjusted as circumstances warrant.

**D. AMOUNT OF HEARING TIME NEEDED**

Based upon the probable number of witnesses, RESA/Shipley estimates that three (3) days should be allotted for hearings.

**E. WITNESSES**

RESA/Shipley intend to provide testimony from Chris Reyes of NRG to address its issues. RESA/Shipley reserves the right to call additional witnesses at any stage of this proceeding as circumstances may warrant.

**F. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

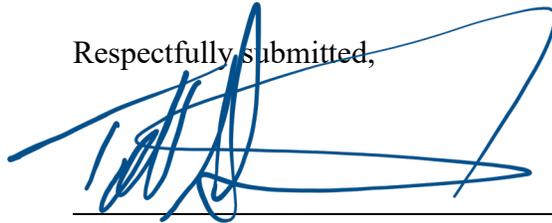
RESA/Shiplay will work with Your Honors and the other Parties to develop a schedule for the submission of testimony, hearings, and briefs.

**G. ANY OTHER APPROPRIATE MATTER**

RESA/Shiplay submits that at this juncture that what is needed is a process and schedule for submitting a settlement, and statements in support before we proceed to develop a process for litigation that may be unnecessary.

WHEREFORE, RESA/Shiplay submit this Prehearing Conference Memorandum in compliance with the Order in this case.

Respectfully submitted,



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DATED: March 3, 2025