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March 3, 2025

**VIA E-MAIL**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. UGI Utilities, Inc.-Gas Division  
Docket Nos. R-2024-3052716 and C-2025-\_\_\_\_\_**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the UGI Industrial Intervenors ("UGIII"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Garber".

Matthew Garber  
MCNEES WALLACE & NURICK LLC

Counsel to UGI Industrial Intervenors

c: Deputy Chief Administrative Law Judge Mark A. Hoyer  
Administrative Law Judge Charece Z. Collins  
Certificate of Service

## CERTIFICATE OF SERVICE

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

### VIA E-MAIL

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Matthew Garber

Counsel to UGI Industrial Intervenors

Dated this 3<sup>rd</sup> day of March, 2025, at Harrisburg, Pennsylvania.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UGI INDUSTRIAL INTERVENORS	:	
	:	
v.	:	DOCKET NO. R-2024-3052716
	:	
UGI UTILITIES, INC.-GAS DIVISION	:	

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**PREHEARING MEMORANDUM OF  
THE UGI INDUSTRIAL INTERVENORS**

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Pursuant to the February 25, 2025, Prehearing Conference Order issued by Administrative Law Judges ("ALJs") Mark A. Hoyer and Charece Z. Collins, the UGI Industrial Intervenors ("UGIII") hereby submit this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On January 27, 2025, UGI Utilities, Inc. – Gas Division ("UGI Gas" or the "Company") filed originals of Tariff Gas – PA. P.U.C. Nos. 7 and 7S (collectively, the "Tariff"), seeking a general rate increase that would raise UGI Gas's "annual jurisdictional revenues by \$110.395 million, or by 9.7%." In addition to copies of its current and proposed Tariff, the Company enclosed a Statement of Reasons and supporting data. If approved, UGI Gas's proposed rates would take effect on or after March 28, 2025.

UGI Gas provides a number of justifications for its proposed rate increase. The Company alleges that current rates are inadequate to enable UGI to earn a fair rate of return. The Company also stipulates that infrastructure improvement efforts, information technology enhancements, and employee compensation costs drive the need for rate adjustment.

On March 3, 2025, UGIII filed a Complaint in this proceeding. A description of UGIII is set forth in UGIII's Complaint. UGIII's Complaint is pending and awaits disposition by the ALJs. A Prehearing Conference has been scheduled in this proceeding for March 4, 2025.

## **II. ANTICIPATED ISSUES AND SUB-ISSUES**

UGIII is concerned with the following issues:

- a) whether UGI Gas's proposed Tariff adjustments are just, reasonable, and in the public interest;
- b) whether the allocation of the proposed rate increase between and among customer rate classes is just, reasonable, and non-discriminatory;
- c) whether UGI Gas's proposed rate structure and rate design are appropriate, just, reasonable, and not unduly discriminatory;
- d) whether the 11.2% ROE proposed by UGI Gas results in a fair Rate of Return;
- e) whether UGI Gas's cost of service study is accurate, legitimate, and appropriately allocates costs among customer rate classes; and
- f) whether UGI Gas's request, as filed, fully justifies its requested relief.

UGIII anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

## **III. PROPOSED WITNESSES**

UGIII is presently evaluating whether it will sponsor testimony in this proceeding. If UGIII chooses to sponsor testimony, it will promptly inform the parties and the ALJs of any intended witnesses and their testimony topics. UGIII also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

## **IV. PROPOSED SCHEDULE AND DISCOVERY RULES**

UGIII will coordinate with the other parties to design a mutually acceptable schedule for discovery and testimony. To the extent necessary, UGIII will also cooperate with the ALJs and the parties at the Prehearing Conference to address any requested modifications to the

Commission's standard discovery rules in accordance with the Commission's Regulations and any directives issued by the ALJs.

**V. POSSIBILITY OF SETTLEMENT**

UGIII is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: March 3, 2025