

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

UGI Utilities, Inc.

Gas Division

Docket No. R-2024-3052716

**PREHEARING MEMORANDUM OF LOCAL 777 OF THE INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

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March 3, 2025

On February 25, 2025, a Prehearing Conference Order was issued by Administrative Law Judges (ALJs) Mark A. Hoyer and Charece Z. Collins setting a telephonic prehearing conference for Tuesday, March 4, 2025, at 10:00 a.m., and requiring parties to file a Prehearing Memorandum by noon of the day prior. In response, Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 777”), by and through undersigned counsel, hereby files this Prehearing Memorandum.

I. Background

On January 27, 2025, UGI Utilities, Inc. – Gas Division (UGI) filed with the PUC its Supplement No. 55 to UGI Gas Tariff – Pa. P.U.C. Nos. 7 and 7S to become effective March 28, 2025 (“Filing”), representing a request for a general increase in its gas distribution rates.

On March 3, 2025, IBEW Local 777 filed a Petition to Intervene in the above-captioned proceeding, in which IBEW Local 777 respectfully requests that the Commission enter an order granting IBEW Local 777 full status as an intervenor in this proceeding with active party status.

II. Issues to be Presented

IBEW Local 777 has reviewed UGI’s proposed tariff changes and testimony and identified the following issues it seeks to address in this proceeding:

1. Wage and Salary Adjustments
2. Management Effectiveness and Performance
3. Safety Initiatives and Training
4. Community Engagement Programs

5. Rate Case Expense
6. Pension and Benefits Expenses
7. Injuries and Damages Adjustment
8. Capital Planning
9. Rate of Return
10. Contractor Expenses
11. Weather Normalization Adjustment
12. Membership Dues

IBEW Local 777 reserves the right to identify additional issues as may arise during the course of the proceeding.

III. Witnesses and Testimony

IBEW Local 777 intends to present the following witnesses to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to the ALJs and the parties:

Daulph A. Kline
Business Manager/Principal Officer
75 Pike Street
Middletown, Pennsylvania 17057
dkline@ibew777.org

William Corcoran
Business Representative
75 Pike Street
Middletown, Pennsylvania 17057
wcorcoran@ibew777.org

Christopher Cortright
Chief Steward/Unit 6 Chairman/Treasurer
75 Pike Street

Middletown, Pennsylvania 17057
christopher.cortright@gmail.com

The witnesses will address the issues identified above, as well as other issues that may arise during this proceeding.

IV. Discovery

IBEW Local 777 does not propose any modifications to the discovery rules at this time. *See* 52 Pa. Code §§ 5.321 et seq.

V. Public Input Hearings

IBEW Local 777 will work with the other parties to propose a mutually agreeable public input hearing schedule to present to the ALJs.

VI. Settlement

IBEW Local 777 is willing to participate in good faith in any and all settlement discussions, whether to resolve this proceeding in whole or in part.

VII. Service on IBEW Local 777

IBEW Local 777 is represented by the following attorneys and should be served as follows:

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IBEW Local 777 requests that the parties agree to electronic service in this proceeding.

VIII. Representation of IBEW Local 777 at Prehearing Conference

At the Prehearing Conference, IBEW Local 777's attorney Morgan L. Bigelow, Esq. will be present and available to provide feedback if requested. Ms. Bigelow's *pro hac vice* application should be filed by the end of this week.

IX. Litigation Schedule

IBEW Local 777 will work with the other parties to propose a mutually agreeable litigation schedule to present to the ALJs.

WHEREFORE, IBEW Local 777 respectfully submits this Prehearing Memorandum.

RESPECTFULLY SUBMITTED this 3rd day of March, 2025.

O'BRIEN, BELLAND & BUSHINSKY, LLC
LUBIN, ENOCH & BUSTAMANTE, P.C.

By: /s/ Mark E. Belland , Esq.
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Counsel to Intervenor-Applicant IBEW Local 777

CERTIFICATE OF SERVICE

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

Dated: March 3, 2025

/s/ Morgan L. Bigelow

Via Electronic Mail

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