

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :
Corporation for Approval of the Alteration of :
the Crossing 517594H by the Installation of :
Two Six-Inch Conduits Containing a 3-Phase :
Distribution Line where Donerville Road :
Crosses the Tracks to the Norfolk Southern : Docket No. A-2025-3054557
Corporation in the Township of West :
Hempfield in Lancaster County :

OBJECTION TO APPROVAL

AND NOW comes Tamara Kelly, counsel for UGI Utilities, Inc. – Gas Division, and objects to the approval of the above-referenced application as follows:

1. UGI Utilities, Inc. - Gas Division (“UGI”) is a public utility that provides gas service to approximately 689,000 customers located in portions of 46 eastern and central Pennsylvania counties.
2. UGI’s principal address is 1 UGI Drive, Denver, PA 17517.
3. The name and address of UGI’s attorney is:

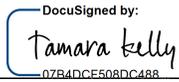
Tamara Kelly
(Attorney I.D. 316360)
500 North Gulph Road
King of Prussia, PA 19406
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Direct: 610-768-3628

4. UGI objects to the approval of the above-referenced application for the following reasons:
 - a. PPL Electric Utilities Corporation’s (“PPL’s”) plans do not show the horizontal and vertical location of UGI’s gas line and its appurtenances along Donerville Rd on either the plan view or side view of the tracks. Consequently, there are no details of the clearances between the proposed pole and conduits relative to horizontal and vertical distances to UGI’s gas line. Therefore, UGI cannot not ascertain the impacts to their facilities with this proposed crossing.

5. UGI wishes to work cooperatively with PPL to resolve this matter, but there is no direct contact information for Mr. Gerber in the application. UGI reached out to PPL's attorney but has not received any response.

WHEREFORE, PPL should be required to amend its application to reflect the gas line location, both horizontal and vertical, and the proposed distances, both horizontal and vertical, from the proposed PPL facilities to the gas line. This will allow UGI to evaluate the impacts of this proposed crossing to their gas line and its appurtenances.

Respectfully submitted,

By:  07B4DCE508DC488

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Counsel for UGI Utilities, Inc. – Gas
Division

Dated: May 2, 2025

Enclosure(s): Verification

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VERIFICATION

I, Geoffrey Ferguson, Sr. Manager, Area Engineering for UGI Utilities, Inc. – Gas Division, hereby state that the facts set forth above are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

DocuSigned by:

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Geoffrey Ferguson
Date: May 2, 2025