

# Lubin, Enoch & Bustamante, P.C.

ARIZONA | COLORADO | NEW MEXICO | OREGON | TEXAS | UTAH | WASHINGTON

Stanley Lubin (1941-2022)

Nicholas J. Enoch

Also admitted in Colorado & Texas

Clara S. Bustamante

Also admitted in New Mexico & Texas

349 North Fourth Avenue

Phoenix, Arizona 85003-1505

(602) 234-0008

Fax: (602) 626-3586

---

Morgan L. Bigelow

Also admitted in New Mexico & Utah

Margot Veranes

Also admitted in New Mexico & Texas

Taylor M. Secemski

Also admitted in Colorado & Utah

Nicholas P. Granath *of Counsel*

Admitted in Oregon & Washington only

July 9, 2025

## VIA ELECTRONIC E-FILING

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pa. PUC v. UGI Utilities, Inc.  
Docket No. R-2024-3052716  
IBEW Local 777's Statement in Support of the Joint Petition for  
Settlement  
Our File No. 1577-004**

Dear Secretary Homsher:

Please find enclosed the Statement in Support of the Joint Petition for Settlement filed on behalf of Intervenor Local 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("Union"). Copies have been served in accordance with the attached Certificate of Service.

Sincerely yours,

/s/ Mark E. Belland

Mark E. Belland

/s/ Morgan L. Bigelow

Morgan L. Bigelow

Counsel to Intervenor IBEW Local 777

cc: Certificate of Service

The Honorable Charece Z. Collins (via email, w/attachment)

The Honorable Mark A. Hoyer (via email, w/attachment)

## **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**

MICHAEL SWERLING  
ASSISTANT GENERAL COUNSEL  
LINDSAY BERKSTRESSER COUNSEL  
UGI UTILITIES INC  
500 NORTH GULPH ROAD  
KING OF PRUSSIA PA 19406  
[swerlingm@oneugi.com](mailto:swerlingm@oneugi.com)  
[berkstresserl@ugicorp.com](mailto:berkstresserl@ugicorp.com)

DAVID B MACGREGOR ESQUIRE  
GARRETT P LENT ESQUIRE  
POST & SCHELL PC  
17TH NORTH 2ND STREET 12TH  
FLOOR  
HARRISBURG PA 17101-1601  
[dmacgregor@postschell.com-email](mailto:dmacgregor@postschell.com-email)  
[glent@postschell.com](mailto:glent@postschell.com)  
(Counsel for UGI Utilities INC- Gas  
Division)

TODD S STEWART ESQUIRE  
HMS LEGAL LLP  
501 CORPORATE CIRCLE SUITE 302  
HARRISBURG PA 17110  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
(Counsel for The Retail Energy Supply  
Association and Shipley Choice, LLC)

SCOTT B GRANGER ESQUIRE  
PA PUC BUREAU OF INVESTIGATION  
& ENFORCEMENT  
SECOND FLOOR WEST  
400 NORTH STREET  
HARRISBURG PA 17120  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

DEVIN T RYAN ESQUIRE  
POST AND SCHELL PC  
ONE OXFORD CENTRE  
301 GRANT STREET SUITE 3010  
PITTSBURGH PA 15219  
[dryan@postschell.com](mailto:dryan@postschell.com)  
(Counsel for UGI Utilities INC- Gas  
Division)

STEVEN C GRAY ESQUIRE  
REBECCA LYTTLE ESQUIRE  
OFFICE OF SMALL BUSINESS  
ADVOCATE  
FORUM PLACE  
555 WALNUT STREET 1ST FLOOR  
HARRISBURG PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

CHRISTY M APPLEBY ESQUIRE  
KATHERINE M KENNEDY  
JACOB D GUTHRIE  
OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET 5TH FLOOR  
FORUM PLACE  
HARRISBURG PA 17101  
[ocaugi2025@paoca.org](mailto:ocaugi2025@paoca.org)

CHARIS MINCAVAGE ESQUIRE  
MATTHEW L. GARBER ESQUIRE  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[mgarber@mcneeslaw.com](mailto:mgarber@mcneeslaw.com)  
(Counsel to the UGI Industrial Intervenors)

JOSEPH KUBAS  
3427 Logan Street  
Camp Hill, PA 17011  
[jkubas25@gmail.com](mailto:jkubas25@gmail.com)

RIA PEREIRA ESQUIRE  
ELIZABETH R MARX ESQUIRE  
JOHN SWEET LEGAL COUNSEL  
LAUREN BERMAN EAQUIRE  
PA UTILITY LAW PROJECT  
118 Locust Street  
HARRISBURG PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
(Counsel for CAUSE-PA)

JOSEPH L. VULLO, ESQUIRE  
BURKE VULLO REILLY ROBERTS  
1460 WYOMING AVENUE  
FORTY FORT, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
(Counsel for Commission on Economic Opportunity)

Mark E. Belland  
O'Brien, Belland & Bushinsky, LLC  
509 South Lenola Road, Building 6  
Morrestown, New Jersey 08057  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)  
[morgan@leblawyers.com](mailto:morgan@leblawyers.com)  
(Counsel for IBEW L. 777)

Dated July 9, 2025

/s/ Cristina Gallardo-Sanidad

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

UGI Utilities, Inc. – Gas Division

Docket No. R-2024-3052716

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**INTERVENOR LOCAL 777 OF THE INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO'S  
STATEMENT IN SUPPORT  
OF THE  
JOINT PETITION FOR SETTLEMENT**

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Intervenor Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 777” or “Union”) hereby submits this Statement in Support of the Joint Petition for Settlement, and respectfully requests the Settlement be approved by Deputy Chief Administrative Law Judge Mark A. Hoyer (“ALJ Hoyer”) and Charece Z. Collins (“ALJ Collins”) (collectively, “ALJs”) and adopted by the Pennsylvania Public Utility Commission (“Commission”). IBEW Local 777 believes the proposed Settlement is in the public interest for the reasons explained below.

**I. INTRODUCTION**

Since its merger with IBEW Locals 1456, 1602, and 1941 in 2022, IBEW Local 777 has had the privilege of being the exclusive bargaining representative for approximately 240 employees of UGI Gas. These employees include, *inter alia*, Welders, Mechanics, Corrosion Technicians, and Utility Support Representatives working across multiple UGI

departments, including Construction and Maintenance, Measurement and Regulation, General Services, Corrosion, Operations Support, and Utility. The employees are the backbone of UGI Gas and contribute daily, directly, and significantly to UGI Gas's efforts to provide safe and reliable gas service to its customers.

## **II. BACKGROUND**

On March 3, IBEW Local 777 filed its Petition to Intervene in the above-captioned rate case. Between March 28, 2025, and June 5, 2025, IBEW Local 777 served two sets of Interrogatories on UGI Gas, and submitted Direct, Rebuttal, and Surrebuttal Pre-Filed Testimony of its witness William Corcoran ("Mr. Corcoran"). On June 9, IBEW Local 777 participated in the Evidentiary Hearing, including presenting its witness for cross-examination by UGI Gas and taking vigorous cross-examination of UGI Gas witness Christopher Brown.

Settlement discussions among the parties were held before and after the Evidentiary Hearing. After multiple exchanges and compromises with UGI Gas and the other parties, IBEW Local 777 finds the Settlement in the public interest and urges its approval by the ALJs and Commission.

## **III. THE JOINT PETITION IS IN THE PUBLIC INTEREST**

"The Commission encourages parties in contested on-the-record proceedings to settle cases." *Pa. Pub. Util. Comm'n v. PECO Energy Company—Electric Div.*, Docket No. R-2021-3024601, at 29 (Recommended Decision entered October 12, 2021, adopted by Commission November 18, 2021) (citing 52 Pa. Code § 5.231). A settlement, by definition, is a compromise of the positions that the parties have held. While not every

issue is of equal concern to every party, on balance, these compromises “arguably foster[] and promote[] the public interest.” *Id.* at 30.

Specifically, IBEW Local 777 submitted testimony and discovery, cross-examined UGI Gas’s witness, and reached compromises on the following settlement terms, which it would like to highlight for the ALJs and Commission’s consideration:

**A. Revenue Requirement (¶ 51)**

In his Direct Testimony, Mr. Corcoran explained that it is in the interest of UGI’s customers to have a highly skilled workforce providing them with safe and reliable service and that such a workforce comes at an attendant cost.<sup>1</sup> UGI Gas is competing for a talented workforce in all of its classifications, and in particular when it comes to skilled craftspeople, such as Welders, Mechanics, Corrosion Technicians, and Emergency First Responders. Ensuring that UGI has this workforce is not an inexpensive endeavor. If UGI is insufficiently funded to provide a competitive employment package, UGI will begin to face a further reduction in its highly skilled workforce, all who work on critically important gas systems. Thus, Local 777 submits that it is in the best interest of utility customers to pay more than rock-bottom prices for gas services. For this reason, and those explained further in its pre-filed testimony, IBEW Local 777 submits that the Joint Petition’s revenue requirement is appropriate, reasonable, and in the public interest.

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<sup>1</sup> IBEW Local 777 Statement No. 1, Direct Testimony of William Corcoran (“Corcoran Direct”) at 6–7.

## **B. Gas Safety (§§ 80–81)**

**Pipeline Restoration Costs:** The Joint Petition provides that UGI Gas will continue to file annual reports relating to the costs for pipeline replacements and that the results of those reports will be discussed with the Commission’s Pipeline Safety Division. As UGI Gas acknowledged in its pre-filed testimony, “[t]he pipeline construction labor market is constrained. To secure skilled labor, contractors must pay higher labor rates, and those rates are passed on to UGI Gas.”<sup>2</sup> This surge in demand for skilled contract labor has caused UGI to revise its 10% anticipated increase in contract labor costs in the FPFTY, to 17.5%, which was actually realized through its RFP process. IBEW Local 777 submits that annually reporting these costs, along with increasing attention on pipeline safety is reasonable and in the public’s interest.

**Methane Detectors:** IBEW Local 777 supports UGI Gas’s two-year pilot methane detector program within its service territory, in which a minimum of 500 units are to be deployed. IBEW Local 777 expressed its support for a methane detector program in its Rebuttal Testimony<sup>3</sup> and continues to believe that the pilot program will provide a critical safety tool and early warning system to customers and gas employees alike.

## **C. Workforce Planning (§ 92)**

**Annual Workforce Planning Report:** Paragraph 92 of the Joint Petition provides that UGI Gas will submit an annual workforce planning report relating to the job classifications found in the IBEW Local 777 Collective Bargaining Agreements as of

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<sup>2</sup> UGI Statement No. 9, Direct Testimony of Christopher R. Brown (“Brown Direct”) at 6.

<sup>3</sup> IBEW Local 777 Statement No. 2, Rebuttal Testimony of William Corcoran at 5–6.

December 31<sup>st</sup> of each year for 2025 and 2026. The report will be submitted directly to the IBEW by March 1st of each following year, and will be filed on the docket to this proceeding. The workforce planning report shall set forth: (i) the number of employees then currently holding these positions; (ii) the present mean and median ages of UGI Gas's workforce with respect to these job classifications (if the number of employees in the classification is greater than 5); (iii) the share of retirement-eligible employees, both as a percentage and in absolute terms, in each of these job classifications (if the number of employees in the classification is greater than 5).

Such reporting requirements are squarely within the bounds of the Commission's authority. Specifically, the Commission has the authority to require a public utility "to file periodical reports, at such times, and in such form, and of such content, as the commission may prescribe and special reports concerning any matter whatsoever which the commission is authorized to inquire or to keep itself informed, or which it is required to enforce." 66 Pa. C.S.A. § 504.

UGI needs to continue its proactive efforts to identify, hire, and train workers to replace those who leave the Company, and also to grow that body of highly skilled field workers it will need to service the ever-expanding base of ratepayers. By and large, UGI Gas cannot simply hire new employees upon the loss of current ones. For multiple skilled positions, the worker still needs to undergo training. Thus, there must be a significant period of overlap between the service periods of vacated positions and their replacements. Without a comprehensive and smart approach to workforce development, UGI will be unable to meet the ongoing and incoming energy demands of our growing community.

Thus, IBEW Local 777 submits that an Annual Workforce Planning Report is a critical first step in addressing UGI Gas's workforce development, and that the inclusion of this term in the Joint Petition is reasonable and in the public interest.

#### **D. Other Provisions in the Settlement**

The Joint Petition includes other provisions not addressed by IBEW Local 777 in this Statement. IBEW Local 777 reviewed the full Joint Petition and submits that on balance, the Joint Petition is reasonable and in the public interest.

#### **IV. CONCLUSION**

Based on its review of the complete Joint Petition IBEW Local 777 finds the Settlement to be reasonable and in the public interest, and for that reason, submits the Settlement for approval by the ALJs and Commission.

Respectfully submitted,

LUBIN, ENOCH & BUSTAMANTE, P.C.

By: /s/ Morgan L. Bigelow  
Morgan L. Bigelow, Esq.  
Admitted *pro hac vice*  
349 North 4<sup>th</sup> Avenue  
Phoenix, Arizona 85003-1505  
Phone: (602) 234-0008  
Fax: (602) 626-3586  
[morgan@leblawyers.com](mailto:morgan@leblawyers.com)

Mark E. Belland  
O'Brien, Belland & Bushinsky, LLC  
509 South Lenola Road, Building 6  
Morrestown, New Jersey 08057  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)  
[morgan@leblawyers.com](mailto:morgan@leblawyers.com)

*Counsel for Intervenor IBEW Local 777*