



COMMONWEALTH OF PENNSYLVANIA

August 8, 2025

**E-FILED**

Matthew L. Homsher, 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  
1307(f) Proceeding / Docket No. R-2025-3054938**

Dear Secretary Homsher:

The Office of Small Business Advocate (“OSBA”) submits this letter to inform the Public Utility Commission that it does not oppose the *Joint Petition for Settlement of Section 1307(f) Rate Investigation* filed by the parties in the above-referenced proceeding. The OSBA filed a Complaint in this proceeding on June 5, 2025. As set forth in the OSBA’s June 10, 2025, prehearing memo, the OSBA reviewed the following issues set forth in the annual Purchased Gas Cost (“PGC”) Rate filing UGI Utilities, Inc. – Gas Division (“UGI” or the “Company”):

- UGI’s actual and forecast lost and unaccounted-for gas rates;
- the Company’s tariff retainage amount for mainline service rate customers;
- the Company’s design day demand forecasting and peak day capacity requirements;
- the Company’s gas supply procurement and price hedging strategy;
- the Company’s gas supply mix and basin diversification strategy;
- the Company’s capacity release and off-system sales arrangements; and
- UGI’s contracts with pipelines and suppliers.

The OSBA also engaged in settlement discussions with UGI and the other parties. The OSBA did not identify any aspects of the issues, set forth above, that were unjust or unreasonable to small business customers. Therefore, this letter serves as formal notice that the OSBA does not oppose the *Joint Petition for Settlement of Section 1307(f) Rate Investigation* filed by the other parties.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Mark Ewen / Maksim Malukoff  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket Nos. R-2025-3054938</b>
	:	<b>C-2025-3055608</b>
<b>UGI Utilities, Inc. - Gas Division</b>	:	
<b>1307(f) Proceeding</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Alphonso Arnold  
Administrative Law Judge  
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Harrisburg, PA 17120  
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Date: August 8, 2025

*/s/ Steven C. Gray*  
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Steven C. Gray  
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Assistant Small Business Advocate  
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