



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 15, 2025

Via Electronic Filing

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)
Docket No. R-2025-3054938
I&E Pre-Served Testimony, Exhibit, and Verification

Dear Secretary Homsher:

Enclosed for electronic filing please find the **NON-PROPRIETARY** version of the Bureau of Investigation and Enforcement's Pre-Served Testimony, Exhibit, and Verification in the above-captioned proceeding. The **PROPRIETARY** version will be submitted to the Secretary's Bureau via their ShareFile. The following documents were admitted into the record via Administrative Law Judge Alphonso Arnold III's Order Granting Joint Stipulation and Admitting Evidence that was issued on August 12, 2025:

**Christopher Keller: I&E Statement No. 1 (Proprietary and Non-Proprietary)
I&E Exhibit No. 1 (Proprietary and Non-Proprietary)
Verification**

Copies of this letter are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 63641
(717) 425-7593
sgranger@pa.gov

SBC/ac
Enclosures

cc: ALJ Alphonso Arnold III (*Cover Letter and Certificate of Service only – via email*)
Per Certificate of Service (*Cover Letter and Certificate of Service only – via email*)

**I&E Statement No. 1
Witness: Christopher Keller
NON-PROPRIETARY**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

UGI UTILITIES, INC. – GAS DIVISION

Docket No. R-2025-3054938

Direct Testimony

of

Christopher Keller

Bureau of Investigation & Enforcement

Concerning:

**Peak Service Contract Payment Schedule
Quarterly PGC Rate Changes**

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1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Christopher Keller. My business address is Pennsylvania Public
4 Utility Commission, Commonwealth Keystone Building, 400 North Street,
5 Harrisburg, PA 17120.

6
7 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

8 A. I am employed by the Pennsylvania Public Utility Commission (Commission) in
9 the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial
10 Analyst.

11

12 **Q. SUMMARIZE YOUR EDUCATION AND EMPLOYMENT HISTORY?**

13 A. An outline of my education and employment history is attached as Appendix A.

14

15 **Q. PLEASE DESCRIBE THE ROLE OF I&E IN RATE PROCEEDINGS.**

16 A. I&E is responsible for protecting the public interest in proceedings before the
17 Commission. I&E's analysis in this proceeding is based on its responsibility to
18 represent the public interest. This responsibility requires the balancing of the
19 interests of the ratepayers, the regulated utility, and the regulated community as a
20 whole.

1 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

2 A. The purpose of my direct testimony is to address UGI Utilities, Inc. - Gas
3 Division's (UGI or Company) peak service contract payment agreement and
4 quarterly purchased gas cost (PGC) rate changes.

5

6 **Q. DOES YOUR DIRECT TESTIMONY INCLUDE AN EXHIBIT?**

7 A. Yes. I&E Exhibit No. 1 contains schedules that support my direct testimony.

8

9 **BACKGROUND**

10 **Q. BRIEFLY EXPLAIN THE THREE FACTORS THAT COMPRISE THE**
11 **PGC RATE.**

12 A. The basic PGC rate formula is $(C-E)/S$ where:

13 C = Cost of gas component or C-factor, representing the projected cost of gas for
14 the rate effective period in the Company's present case from December 1, 2025 to
15 November 30, 2026.

16 E = Experienced over/under collections or E-factor, reconciling variations between
17 the projected gas costs and actual gas costs as well as variances between projected
18 and actual sales. The E-factor also serves as the vehicle to pass through
19 miscellaneous revenues, including penalties and supplier refunds, and to calculate
20 interest.

21 S = Sales, representing a projection of sales for the effective period.

1 **Q. BRIEFLY EXPLAIN THE FILING REQUIREMENTS FOR NATURAL**
2 **GAS DISTRIBUTORS WITH GROSS INTRASTATE ANNUAL**
3 **OPERATING LEVELS IN EXCESS OF \$40 MILLION.**

4 A. A Section 1307(f) gas distribution utility is required to file an annual tariff
5 reflecting natural gas costs. The utility is further required to make quarterly filings
6 at three months, six months, nine months, and twelve months after the effective
7 date of the tariff. The rates are to be recalculated to reconcile under collections or
8 over collections due to changes in gas costs or changes in volumes from the
9 original projection. If the reconciliation results in a recalculated rate that differs
10 by more than 2% from the existing tariff rate, a new tariff should be filed to
11 incorporate the new rate. The rate change necessitated by the quarterly filing is
12 reflected in the gas cost C-factor to capture and mitigate annual revenue and cost
13 disparities in the effective annual period.

14

15 **C-FACTOR QUARTERLY ADJUSTMENTS**

16 **Q. WHAT DETERMINES THE QUARTERLY CHANGE TO THE**
17 **C-FACTOR?**

18 A. In a quarterly filing, the Company provides actual and estimated over/under
19 collections for the prior quarter and updated over/under collection estimates for
20 the remainder of the current PGC year. The incremental change to the monthly
21 over/under collections that were reported in the previous quarterly filing represents

1 the additional over/under collection amount that is to be addressed by adjusting the
2 C-factor to minimize the prospective over/under collection balance.

3
4 **Q. HOW ARE THE ACTUAL QUARTER'S RESULTS IN THE FINAL PGC**
5 **QUARTER ADDRESSED?**

6 A. The final quarter's residual over/under collections will become part of the E-factor
7 that is recovered in the next PGC year.

8
9 **E-FACTOR RECONCILIATION**

10 **Q. WHAT IS THE COMPANY'S PGC RATE YEAR?**

11 A. The Company's PGC rate year is from December 1st through November 30th
12

13 **Q. IN THE COMPLIANCE FILING EFFECTIVE DECEMBER 1, 2025,**
14 **WHICH MONTHS ARE RECONCILED WITH ACTUAL DATA TO**
15 **DETERMINE THE CURRENT OVER/UNDER COLLECTIONS FOR THE**
16 **TWELVE-MONTH PERIOD ENDING NOVEMBER 30, 2025?**

17 A. The months of December through October are reconciled with actual data, while
18 November is reconciled with estimated data.

19
20 **Q. WHEN IS NOVEMBER RECONCILED WITH ACTUAL DATA?**

21 A. November is reconciled with actual data in the March 1 quarterly filing.

1 **Q. DO YOU AGREE WITH THE RECONCILIATION OF NOVEMBER'S**
2 **PROJECTED DATA WITH ACTUAL DATA IN THE MARCH 1**
3 **QUARTERLY FILING?**

4 A. Yes.

5

6 **PEAK SERVICE CONTRACT PAYMENT SCHEDULE**

7 **Q. WHAT IS UGI'S PEAK SERVICE CONTRACT PAYMENT SCHEDULE?**

8 A. UGI maintains several contracts with its affiliate, UGI Energy Services (UGIES),
9 for winter peak needs.¹ The Company generally spreads the payments for these
10 services over a five-month period beginning in November.

11

12 **Q. WHAT WAS THE NOVEMBER 2024 OVER/UNDER COLLECTION IN**
13 **THE PRESENT FILING?**

14 A. In November 2024, the actual results reflect revenues of \$15,385,826 and gas
15 costs of \$34,157,331.² The actual result was an under collection of \$18,771,505
16 (\$15,385,826 - \$34,157,331).

17

18 **Q. WHAT IS THE PRIMARY REASON FOR THE UNDER COLLECTION IN**
19 **NOVEMBER?**

20 A. November is the beginning of the heating season with usage amounts well below
21 projected and experienced usage for the heating months of December through

¹ UGI Book 2, Schedule B, p. 2.

² UGI Book 2, Schedule C, p. 5.

1 March. Despite anticipated and projected low usage and revenue in November,
2 ratepayers are assessed a cost for peak contracts that exceeds the need in that
3 month, the last month of the PGC year. This is a mismatch of costs and revenues
4 and may contribute to a larger E-factor in conjunction with the existing C-factor
5 calculation methodology.

6
7 **Q. WHAT IS THE INTEREST IMPACT TO RATEPAYERS IN THE**
8 **CURRENT FILING?**

9 A. In the current filing, the actual result yields an interest cost to ratepayers of
10 \$930,754.³

11
12 **Q. WERE THERE ANY TERMS AGREED TO IN THE 2021 PGC**
13 **SETTLEMENT REGARDING THE COMPANY'S PEAKING SERVICE**
14 **CONTRACTS?**

15 A. Yes. As part of the 2021 PGC settlement, the Company was to provide a modified
16 requests for proposal (RFP) based on the inclusion of the November peaking
17 contract payment and without the November peaking contract payment. The
18 Company was also to provide an evaluation of the PGC over/under collection and
19 PGC interest impacts based on the inclusion of the November peaking contract
20 payment and without the November peaking contract payment in the 2025 PGC

³ *Id.*

1 proceeding.⁴

2

3 **Q. DID THE COMPANY PROVIDE RFP RESPONSES FOR ITS PEAKING**
4 **CONTRACTS?**

5 A. Yes. **{BEGIN PROPRIETARY}** [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] **{END PROPRIETARY}**

⁴ Docket No. R-2021-3025652, Settlement Agreement, paragraph 24.

⁵ I&E Exhibit No. 1, Schedule 1, pp. 1-6.

⁶ I&E Exhibit No. 1, Schedule 1, pp. 8-9.

⁷ I&E Exhibit No. 1, Schedule 1, pp. 10-11.

1 **Q. DID THE COMPANY PROVIDE THE EVALUATION OF THE PGC**
2 **OVER/UNDER COLLECTION AND PGC INTEREST IMPACTS BASED**
3 **ON THE INCLUSION OF THE NOVEMBER PEAKING CONTRACT**
4 **PAYMENT AND WITHOUT THE NOVEMBER PEAKING CONTRACT**
5 **PAYMENT?**

6 A. No. The Company states that they were unable to perform a comparison of the
7 interest impacts based on the inclusion of the November peaking contract payment
8 because the Company did not receive any RFP which provided payment terms
9 with the inclusion of the November peaking contract payment and without the
10 November peaking contract payment.⁸

11
12 **Q. DID THE COMPANY PROVIDE A RECOMMENDATION REGARDING**
13 **THE THREE-YEAR PILOT PROGRAM FOR ITS PEAKING CONTRACT**
14 **RFPs?**

15 A. Yes. UGI recommends to continue the pilot program for an additional period of
16 time as there was not enough information provided during the pilot program
17 period to make a reasonable recommendation.⁹

⁸ UGI Statement No. 2, p. 19, lines 6-13.

⁹ UGI Statement No. 2, p. 19, lines 15-19.

1 **Q. DID UGI PROVIDE A RECOMMENDATION AS TO HOW MUCH**
2 **LONGER TO CONTINUE THE PILOT PROGRAM FOR ITS PEAKING**
3 **CONTRACT RFPs?**

4 A. Yes. In response to I&E-I-6, the Company states that it recommends continuing
5 the pilot program for another three-year period as no bidder provided a response
6 for five months of service with a payment option of four months.¹⁰

7
8 **Q. WHAT IS YOUR RECOMMENDATION?**

9 A. I accept the Company's recommendation to continue the pilot program for another
10 three years where the results will be reviewed in the 2028 1307(f) proceeding.

11

12 **Q. DO YOU AGREE WITH THE NOVEMBER PAYMENT FOR PEAKING**
13 **CONTRACTS?**

14 A. While I disagree with the inclusion of the November payment for peaking
15 contracts, I am not making a related recommendation in this proceeding for the
16 reasons stated above. It is important to note that my recommendation to continue
17 the pilot program does not constitute agreement regarding how the Company
18 spreads the payments for its peaking contracts.

¹⁰ I&E Exhibit No. 1, Schedule 2.

1 **QUARTERLY PGC RATE CHANGES**

2 **Q. WHAT IS UGI'S METHODOLOGY FOR CALCULATING ITS PGC**
3 **RATE CHANGES?**

4 A. As part of the settlement agreement in the 2019 1307(f) proceeding,¹¹ UGI agreed
5 to use the methodology per the settlement agreement in the 2017 1307(f)
6 proceeding¹² where it would continue to use the rate caps on quarterly rate
7 changes of 15% for September 1st and 25% for the December 1st, March 1st, and
8 June 1st quarterly filings. UGI would also use either annual sales or remaining life
9 sales for each quarterly filing to determine the PGC rate change. Additionally,
10 and more importantly, as part of the settlement agreement in the 2019 1307(f)
11 proceeding, UGI agreed to provide data in order to perform an analysis in the 2023
12 1307(f) proceeding to evaluate the results from calculating the PGC rate changes
13 under the settlement in the 2017 1307(f) proceeding as compared to what the
14 results would be using the remaining life method under the settlement agreement
15 in the 2016 1307(f) proceeding.

16
17 **Q. HOW DID THE COMPANY CALCULATE THE QUARTERLY PGC**
18 **RATE PRIOR TO THE 2017 SETTLEMENT AGREEMENT?**

19 A. In the settlement of the 2014 1307(f) proceeding at Docket No. R-2014-2420276,
20 the Company agreed to utilize the remaining life methodology recommended by

¹¹ Docket No. R-2019-3009647, Settlement Agreement, paragraph 18.

¹² Docket No. R-2017-2602638, Settlement Agreement, paragraph 24.

1 I&E, with the exception that the final quarterly filing on September 1 of each year
2 would be calculated over a six-month remaining life volume instead of the actual
3 three-month remaining life volume. The Company also included a quarterly rate
4 adjustment cap of 25% to limit the volatility of the remaining life methodology.

5 In the settlement of the 2016 UGI 1307(f) proceeding at Docket No.
6 R-2016-2543309, the Company included a quarterly rate adjustment cap of 15%
7 for its September 1st quarterly filing, starting September 1, 2017 using a three-
8 month remaining life volume with any amount above the cap being brought
9 forward for inclusion in the calculation of subsequent quarterly PGC rate
10 adjustment to limit the volatility of the remaining life methodology.

11 As I stated earlier, according to the 2017 settlement at Docket No. R-2017-
12 2602638, UGI may utilize either annual sales or remaining life sales for each
13 quarterly filing to determine the PGC rate change and agreed to continue using the
14 rate caps on quarterly rate changes of 15% for September 1st and 25% for the
15 December 1st, March 1st, and June 1st quarterly filings. And, as discussed above,
16 UGI will continue this methodology in the instant 1307(f) proceeding.

17
18 **Q. DO YOU AGREE WITH UGI USING ANNUAL SALES IN**
19 **CALCULATING EACH QUARTERLY PGC RATE?**

20 **A.** While I disagree with any proposed use of annual volumes to calculate the PGC
21 rate change beyond the first quarter, I am not making a related recommendation in

1 this proceeding because the parties agreed to the three-year study in the 2023
2 settlement.

3
4 **Q. WHY ARE YOU NOT MAKING A RECOMMENDATION REGARDING**
5 **THE CURRENT METHODOLOGY TO CALCULATE THE QUARTERLY**
6 **PGC RATE?**

7 A. As stated above, as part of the settlement agreement in the 2023 1307(f)
8 proceeding, I&E agreed to UGI's use of the methodology per the settlement
9 agreement in the 2017 1307(f) proceeding to determine the quarterly PGC rate. It
10 was further agreed as follows:

11 Additionally, the Company will perform a side-by-side
12 analysis of the methods identified in UGI Gas Statement No.
13 3, the direct testimony of Tracy A. Hazenstab, as QAM1 and
14 QAM2 for a period of three years. The analysis will show the
15 comparative PGC rate change that would result under both
16 methods for each quarterly rate change. The analysis will
17 include a comparison of end-of-PGC-year e-factor over and
18 under collections for QAM1 compared to QAM2. At the
19 conclusion of the analysis, as part of the Company's 2027 PGC
20 filing, the Company will propose criteria for use in determining
21 when QAM1 and QAM2 will be used prospectively to
22 calculate the PGC rate change.¹³

23 It is important to note that while I&E agreed to the terms in the 2023
24 1307(f) settlement agreement, this does not constitute agreement regarding the
25 current methodology being used. Furthermore, as noted above, the current

¹³ Docket No. R-2023-3040290. Settlement Agreement, paragraph 22.

1 methodology is still under evaluation for a three-year period where the results will
2 be reviewed in the 2027 1307(f) proceeding.

3

4 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5 A. Yes.

Professional and Educational Experience
Christopher Keller

Professional Experience

January 2014 to Present
Fixed Utility Financial Analyst
Pennsylvania Public Utility Commission, Harrisburg, Pennsylvania
Bureau of Investigation & Enforcement

September 2008 to January 2014
Insurance Company Financial Analyst
Pennsylvania Insurance Department, Harrisburg, Pennsylvania
Bureau of Licensing & Financial Analysis

Education and Training

FAI Utility Finance and Accounting for Financial Professionals, Boston, MA
May 21-23, 2014

York College of Pennsylvania, York, Pennsylvania
Master of Business Administration, Finance Concentration, 2008
Bachelor of Science, Accounting, 2006

Testimony Submitted

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2024-3052716 – UGI Utilities, Inc. – Gas Division (O&M)
- Docket No. R-2024-3052357 – Pike County Light & Power Company (Gas) (ROR)
- Docket No. A-2022-3033138 – Aqua Pennsylvania Wastewater, Inc. – Acquisition of the Wastewater System Assets of the City of Beaver Falls (1329)
- Docket No. P-2024-3051313 – Rock Spring Water Company (529 Investigation)
- Docket No. R-2024-3047822 – Aqua Pennsylvania, Inc. (ROR)
- Docket No. R-2024-3047824 – Aqua Pennsylvania Wastewater, Inc. (ROR)
- Docket No. M-2023-3042180 - Venango Water Company, Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company, and Blaine E. Rhodes Sewer Company (529 Investigation)
- Docket No. R-2024-3048828 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2024-3046932 – PECO Energy Company – Gas Division (O&M)
- Docket No. R-2024-3046523 – Duquesne Light Company (ROR)
- Docket No. R-2023-3044549 – Peoples Natural Gas Company LLC (O&M)
- Docket No. R-2023-3040258 – Columbia Water Company (O&M and ROR)
- Docket No. R-2023-3040290 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2022-3037368 – UGI Utilities, Inc. – Electric Division (O&M)

**Professional and Educational Experience
Christopher Keller**

Testimony Submitted (Continued)

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2022-3035730 – National Fuel Gas Distribution Corporation (O&M)
- Docket No. R-2022-3031340 – York Water Company – Water (ROR)
- Docket No. R-2022-3032806 – York Water Company – Wastewater (ROR)
- Docket No. R-2022-3032300 – Valley Energy, Inc. (ROR)
- Docket No. R-2022-3031704 – Borough of Ambler – Water Department (ROR)
- Docket No. R-2022-3032242 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2022-3031211 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. A-2021-3026132 – Aqua Pennsylvania Wastewater, Inc. – Acquisition of the Wastewater Collection and Conveyance System Assets of East Whiteland Township (1329)
- Docket No. P-2021-3030012 – Metropolitan Edison Company (DSP)
- Docket No. P-2021-3030013 – Pennsylvania Electric Company (DSP)
- Docket No. P-2021-3030014 – Pennsylvania Power Company (DSP)
- Docket No. R-2024-3046932 – PECO Energy Company – Gas Division (ROR)
- Docket No. P-2021-3030021 – West Penn Power Company (DSP)
- Docket No. R-2021-3026116 – Borough of Hanover – Water (ROR)
- Docket No. R-2021-3025206 – Community Utilities of Pennsylvania – Water Division (ROR)
- Docket No. R-2021-3025207 – Community Utilities of Pennsylvania – Wastewater Division (ROR)
- Docket No. R-2021-3025652 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2021-3024750 – Duquesne Light Company (O&M and ROR)
- Docket No. R-2021-3024296 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. R-2020-3018929 – PECO Energy Company – Gas Division (ROR)
- Docket No. P-2020-3020914 – Twin Lakes Utilities, Inc. (529 Proceeding)
- Docket No. R-2020-3018835 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. R-2020-3019680 – UGI Utilities, Inc. (1307(f))
- Docket No. P-2020-3019356 – PPL Electric Utilities Corporation (DSP)
- Docket No. R-2019-3015162 – UGI Utilities, Inc. – Gas Division (ROR)
- Docket No. R-2019-3010955 – City of Lancaster – Sewer Fund (O&M)
- Docket No. R-2019-3009647 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2018-3006818 – Peoples Natural Gas Company LLC (O&M)
- Docket No. R-2018-3000124 – Duquesne Light Company (O&M)
- Docket No. R-2018-3001631 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2018-3001632 – UGI Penn Natural Gas, Inc. (1307(f))
- Docket No. R-2018-3001633 – UGI Utilities, Inc. (1307(f))
- Docket No. R-2018-2645938 – Philadelphia Gas Works (1307(f))
- Docket No. P-2017-2637855 – Metropolitan Edison Company (DSP)

**Professional and Educational Experience
Christopher Keller**

Testimony Submitted (Continued)

I have testified and/or submitted testimony in the following proceedings:

- Docket No. P-2017-2637857 – Pennsylvania Electric Company (DSP)
- Docket No. P-2017-2637858 – Pennsylvania Power Company (DSP)
- Docket No. P-2017-2637866 – West Penn Power Company (DSP)
- Docket No. R-2017-2602627 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2017-2602638 – UGI Utilities, Inc. (1307(f))
- Docket No. R-2017-2586783 – Philadelphia Gas Works (O&M)
- Docket No. R-2017-2587526 – Philadelphia Gas Works (1307(f))
- Docket No. I-2016-2526085 – Delaware Sewer Company (529 Proceeding)
- Docket No. R-2016-2531550 – Citizens’ Electric Company (O&M)
- Docket No. R-2016-2531551 – Wellsboro Electric Company (O&M)
- Docket No. R-2016-2537349 – Metropolitan Edison Company (CWC and CAP)
- Docket No. R-2016-2537352 – Pennsylvania Electric Company (CWC and CAP)
- Docket No. R-2016-2537355 – Pennsylvania Power Company (CWC and CAP)
- Docket No. R-2016-2537359 – West Penn Power Company (CWC and CAP)
- Docket No. R-2016-2543311 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2015-2518438 – UGI Utilities, Inc. – Gas Division (CWC and USP)
- Docket No. P-2015-2511333 – Metropolitan Edison Company (DSP)
- Docket No. P-2015-2511351 – Pennsylvania Electric Company (DSP)
- Docket No. P-2015-2511355 – Pennsylvania Power Company (DSP)
- Docket No. P-2015-2511356 – West Penn Power Company (DSP)
- Docket No. R-2015-2468056 – Columbia Gas of Pennsylvania, Inc. (O&M)
- Docket No. P-2014-2404341 – Delaware Sewer Company (529 Investigation)
- Docket No. R-2014-2452705 – Delaware Sewer Company (O&M)
- Docket No. R-2014-2428304 – Borough of Hanover – Water (O&M)
- Docket No. R-2014-2419774 – Wellsboro Electric Company (Customer Choice Support Charge)
- Docket No. R-2014-2420279 – UGI Central Penn Gas, Inc. (1307(f))

Assisted with the Following Cases

- Docket No. R-2017-2631441 – Reynolds Water Company (ROR)
- Docket No. R-2016-2580030 – UGI Penn Natural Gas, Inc. (ROR)
- Docket No. R-2014-2462723 – United Water Pennsylvania (CWC)
- Docket No. R-2014-2428742 – West Penn Power Company (CWC)
- Docket No. R-2014-2428743 – Pennsylvania Electric Company (CWC)
- Docket No. R-2014-2428744 – Pennsylvania Power Company (CWC)
- Docket No. R-2014-2428745 – Metropolitan Edison Company (CWC)
- Docket No. R-2013-2397353 – Pike County Light & Power Company (Gas) (O&M)

Testimony Submitted (Continued)

I have assisted in the following proceedings:

- Docket No. R-2013-2397237 – Pike County Light & Power Company (Electric) (O&M)

**I&E Exhibit No. 1
Witness: Christopher Keller
NON-PROPRIETARY**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

UGI UTILITIES, INC. – GAS DIVISION

Docket No. R-2025-3054938

Exhibit to Accompany

the

Direct Testimony

of

Christopher Keller

Bureau of Investigation and Enforcement

Concerning:

**Peak Service Contract Payment Schedule
Quarterly PGC Rate Changes**

I&E Statement No. 1
Schedule 1
Page 3 of 11
PROPRIETARY

I&E Statement No. 1
Schedule 1
Page 6 of 11
PROPRIETARY

I&E Statement No. 1
Schedule 1
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PROPRIETARY

I&E-I-6

Request:

Reference Book 2, UGI Statement No. 2, p. 19, lines 15-19 concerning the three-year pilot study for modified payment terms for RFPs. State and provide a detailed explanation for the additional period of time the Company believes would be sufficient to obtain enough information to make a reasonable recommendation.

Response:

UGI Gas has not received any responses that would allow for sufficient analysis of the pilot program. No bidder has provided a response to show five-months of service with a four-month payment option.

The Company recommends to continue the pilot period for another three-year period.

Prepared by or under the supervision of: Jesse R. Tyahla

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3054938
	:	
UGI Utilities, Inc. – Gas Division	:	
1307(f) PGC	:	

**WITNESS VERIFICATION
THE BUREAU OF INVESTIGATION AND ENFORCEMENT**

I, Christopher Keller, on behalf of the Bureau of Investigation and Enforcement, hereby verify that the documents preliminarily identified as:

- I&E Statement No. 1 PROPRIETARY and Non-Proprietary; and
- I&E Exhibit No. 1, PROPRIETARY and Non-Proprietary.

were prepared by me or under my direct supervision and control. Furthermore, the facts contained therein are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at an Evidentiary Hearing in this matter. This Verification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

/s/Christopher Keller
Christopher Keller
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

Dated: July 16, 2025