



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

September 2, 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,  
Bureau of Investigation and Enforcement v.  
UGI Utilities, Inc. - Gas Division  
Docket No. C-2025-3055919  
**I&E Reply to New Matter**

Dear Secretary Homsher:

Enclosed for electronic filing please find the Reply of the Bureau of Investigation and Enforcement to the New Matter of UGI Utilities, Inc. - Gas Division with regard to the above-referenced proceeding.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colby B. Widdowson', is written over a light blue circular stamp.

Colby B. Widdowson  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 326185  
(717) 787-2139  
[cwiddowson@pa.gov](mailto:cwiddowson@pa.gov)

CBW/ac  
Enclosures

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3055919
	:	
UGI Utilities, Inc. – Gas Division	:	
Respondent	:	

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**REPLY OF THE BUREAU OF INVESTIGATION AND  
ENFORCEMENT TO THE NEW MATTER OF UGI  
UTILITIES, INC. – GAS DIVISION**

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NOW COMES, the Bureau of Investigation and Enforcement (“I&E” or “Complainant”) of the Pennsylvania Public Utility Commission (“Commission”) by and through its prosecuting attorneys, and files this Reply to the New Matter of UGI Utilities, Inc. - Gas Division (“UGI Gas” or “Respondent”), pursuant to 52 Pa. Code § 5.63(a). In support thereof, I&E avers as follows:

1. Paragraph 1 re-alleges and reincorporates by reference preceding allegations and requires no response.
2. Admitted in part and denied in part. Admitted in that Pronto Plumbing provided services to 3204 Crest Road on November 4, 2022. Any characterization of the invoice is denied, as it is a document the entirety of which speaks for itself.
3. Admitted in that Pronto Plumbing provided a written estimate to the homeowner of 3204 Crest Road on December 12, 2022. Any characterization of the letter is denied, as it is a document the entirety of which speaks for itself.

4. Admitted in part and denied in part. Any characterization of Exhibit C is denied, as it is a document the entirety of which speaks for itself. The remainder of the allegations in Paragraph 4 are admitted.

5. Paragraph 5 contains a legal conclusion to which no response is required. To the extent a response is required, I&E denies any factual averments contained in Paragraph 5. Any characterization that an emergency did not exist or UGI Gas was relieved of its obligations as a natural gas distribution company due to a lack of an emergency is denied.

6. Admitted.

7. Admitted in part and denied in part. Denied that Pronto Plumbing arrived at 3204 Crest Road on December 13, “2020”. Admitted that Pronto Plumbing arrived at 3204 Crest Road on December 13, 2022. By way of further reply, I&E incorporates Paragraph 49 of its Formal Complaint.

8. Admitted.

9. Admitted in part and denied in part. Denied in that I&E is without knowledge as to Pronto Plumbing’s actual knowledge on December 13, 2022 of the natural gas line’s location. The remainder of the allegations in Paragraph 9 are admitted.

10. Denied. Upon information and belief, Dauphin County 911 Dispatch sent out an alarm directed at Progress Fire Department at 9:02 a.m. and at 9:06 a.m. Engine 32-1 departed Progress Fire Station enroute to 3204 Crest Road.

11. Admitted in part and denied in part. Denied in that I&E is without knowledge as to Pronto Plumbing’s actual knowledge, on December 13, 2022, of the natural gas line’s location. Any characterization of Exhibit C is denied, as it is a document the entirety of which speaks for itself. The remainder of the allegations in Paragraph 11 are admitted.

12. Admitted in part and denied in part. Any characterization of Exhibit D is denied, as it is a document the entirety of which speaks for itself. The remainder of the allegations in Paragraph 12 are admitted.

13. Paragraph 13 is a legal conclusion as to whether Pronto Plumbing violated PA One Call Law, to which no response is required.

14. Admitted.

15. Paragraph 15 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 15 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint.

16. Denied. I&E is without knowledge as to UGI Gas's awareness of Pronto Plumbing's prior history with PA One Call. By way of further Answer, on September 13, 2022, at Case No. 016966, the Damage Prevention Committee made an informal determination that Respondent violated 73 P.S. § 180(9), in that the emergency notification submitted by Respondent did not meet the requirements of "emergency" as defined by the PA One Call Law. Any characterization that an emergency did not exist or UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to a lack of an emergency is denied.

17. Paragraph 17 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 17 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

18. Paragraph 18 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 18 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

19. Admitted in part and denied in part. Admitted in that I&E believes that Pronto Plumbing violated the PA One Call Law, as evidenced by I&E's Formal Complaint against Pronto Plumbing at Docket no. C-2025-3055920. The remainder of Paragraph 19 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 19 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

20. Admitted in part and denied in part. Admitted in that I&E believes that Pronto Plumbing violated the PA One Call Law, as evidenced by I&E's Formal Complaint against Pronto Plumbing at Docket no. C-2025-3055920. The remainder of Paragraph 20 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 20 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

21. Admitted in part and denied in part. Admitted in that I&E believes that Pronto Plumbing violated the PA One Call Law, as evidenced by I&E's Formal Complaint against

Pronto Plumbing at Docket no. C-2025-3055920. The remainder of Paragraph 21 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 21 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

22. Admitted in part and denied in part. Admitted in that Pronto Plumbing used powered equipment and I&E believes that Pronto Plumbing violated the PA One Call Law, as evidenced by I&E's Formal Complaint against Pronto Plumbing at Docket no. C-2025-3055920. The remainder of Paragraph 22 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 22 and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint. I&E is without knowledge as to Pronto Plumbing's actual knowledge, on December 13, 2022, of the natural gas line's location. Any characterization that UGI Gas was relieved of its duties and responsibilities as a natural gas distribution company due to the actions of Pronto Plumbing is denied.

23. Paragraph 23 is a legal conclusion to which no response is required. To the extent a response is required, I&E denies the averments in Paragraph 23 as the date of the incident was December 13, 2022, and incorporates by reference Paragraphs 1 through 122 in I&E's Formal Complaint.

24. Paragraph 24 seeks to generally reserve any and all affirmative defenses, to which no response is required.

**WHEREFORE**, for all the foregoing reasons, the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission respectfully requests that, after consideration of the record, the Office of Administrative Law Judge and the Commission deny Respondent's New Matter and request to dismiss the Complaint and find Respondent in violation of each count as set forth in the Complaint.

Respectfully submitted,



Colby Widdowson  
Prosecutor  
PA Attorney ID No. 326185

Michael L. Swindler  
Deputy Chief Prosecutor  
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 787-2139  
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Date: September 2, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement  
Complainant

v.

UGI Utilities, Inc. – Gas Division  
Respondent

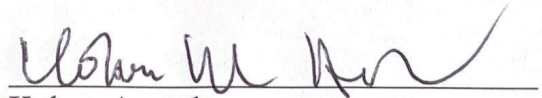
Docket No. C-2025-3055919

**VERIFICATION**

I, Kokou Apetoh, Fixed Utility Valuation Engineer, Pipeline Safety Division, Bureau of Investigation and Enforcement, hereby state that the facts above set forth 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.

Date:

8/20/2025



Kokou Apetoh  
Fixed Utility Valuation Engineer  
Pipeline Safety Division  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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Respondent	:	


**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).

**Service by Electronic Mail:**

Michael Swerling, Esq.  
UGI Corporation  
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Dated: September 2, 2025