

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Matterns Floral	:	
c/o Michelle Valentino Bedford	:	
	:	C-2025-3056200
v.	:	C-2025-3056208
	:	
UGI Utilities, Inc.	:	

INTERIM ORDER

Formal Complaint at Docket No. C-2025-30056208 – Gas Complaint

On July 3, 2025, Michelle Valentino Bedford filed a Formal Complaint (Gas Complaint) with the Pennsylvania Public Utility Commission (Commission) on behalf of Matterns Floral (Complainant) against UGI Utilities, Inc. (UGI or Respondent) alleging that the utility is refusing to issue a payment arrangement for the gas service at Account Nos. ending in 9681 and 9921. The Complainant further avers that the Respondent is continuously requesting prohibitive security deposits in order to maintain service while not applying any of the previously paid security deposits towards the outstanding balance. As relief, the Complainant requests that the Commission establish a payment arrangement and ensure that any previous security deposits paid to the Respondent to be applied towards the outstanding balance. The Complainant also requests that the Commission order UGI to stop requiring prohibitive security deposits to keep the service on.

On July 29, 2025, UGI filed an Answer with New Matter. In its Answer, the UGI admitted in part, and denied in part the averments in the Complaint. Specifically, the Respondent averred that the name on the account which this Complaint concerns is Matterns Floral Co LLC. Answer ¶ 1. In its New Matter, UGI requested that the Commission require the Complainant to have legal representation in this proceeding following the filing of UGI Electric’s Answer and New Matter, pursuant to the Commission’s regulations at 52 Pa. Code §§ 1.21-1.23.

Formal Complaint at Docket No. C-2025-30056200 – Electricity Complaint

On July 8, 2025, Michelle Valentino Bedford filed a Formal Complaint (Electricity Complaint) with the Commission on behalf of Matterns Floral against UGI alleging that the utility is refusing to issue a payment arrangement for her electric service at Account No. ending in 1585. The Complainant further avers that the Respondent is continuously requesting prohibitive security deposits to maintain service while not applying any of the previously paid security deposits towards the outstanding balance. As relief, Complainant requests that the Commission establish a payment arrangement and ensure that any previous security deposits paid to the Respondent to be applied towards the outstanding balance. The Complainant also requests that the Commission order UGI to stop requiring prohibitive security deposits to keep the service on.

On July 29, 2025, UGI filed an Answer with New Matter. In its Answer, the UGI admitted in part, and denied in part the averments in the Electricity Complaint. Specifically, the Respondent averred that the name on the account which this Complaint concerns is Matterns Floral Co LLC. Answer ¶ 1. In its New Matter, UGI requested that the Commission require the Complainant to have legal representation in this proceeding following the filing of UGI Electric's Answer and New Matter, pursuant to the Commission's regulations at 52 Pa. Code §§ 1.21-1.23.

By Hearing Notice¹ dated August 28, 2025, a telephonic hearing was scheduled for October 22, 2025. Regarding representation of parties in a formal hearing before the Commission, the Hearing Notice stated as follows,

REPRESENTATION. If you are an individual, you may represent yourself or you may have an attorney represent you. **All others, including a partnership, corporation, limited liability company, trust, association, or governmental agency or subdivision, must be represented by an attorney licensed to practice law in Pennsylvania, or admitted pro hac vice. Only an attorney may represent someone else.**

¹ The Hearing Notice included the Docket Numbers for both the Gas and the Electricity Complaints.

August 28, 2025, Hearing Notice, p. 2. **(Emphasis added)**.

On August 28, 2025, I issued a Prehearing Order² reminding the parties of the time and date of the hearing, informing them of the procedures applicable to this proceeding, and directing the submission of documents prior to the hearing.³ Regarding representation of parties in a formal hearing before the Commission, the Prehearing Order directed as follows,

REPRESENTATION. If you are an individual, you may represent yourself or you may have an attorney representing you. **All others, including a partnership, corporation, limited liability company, trust, association, or governmental agency or subdivision, must be represented by an attorney licensed to practice law in Pennsylvania, or admitted *pro hac vice*.** And, unless you are an attorney, you may not represent someone else.

August 28, 2025, Prehearing Order ¶ 7. **(Emphasis added)**.

On October 1, 2025, UGI filed a Motion to Consolidate the Electricity Complaint with the Gas Complaint.

The Motion is ready for disposition.

² The Prehearing Order included the Docket Numbers for both the Gas and the Electricity Complaints.

³ By email dated October 3, 2025, counsel for UGI requested the continuance of the hearing scheduled for October 22, 2025, at 10:00 a.m. in the above-captioned matter. As reason for requesting the continuance, counsel cited a conflict in her schedule. By email dated October 10, 2025, Michelle Bedford objected to UGI's request for continuance. On October 15, 2025, I issued an Order granting UGI's request for a continuance of the hearing. The October 22, 2025, hearing has been cancelled and rescheduled for December 2, 2025.

a) **Consolidation of the Two Complaints**

The Commission regulation pertaining to consolidation appears at 52 Pa. Code §5.81, and states, in relevant part:

§5.81. Consolidation.

(a) The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

The question of consolidation is clearly left to the sound discretion of the Commission or presiding officer.

Cases have been consolidated for adjudication; Re Middletown Taxi Company, 50 Pa. PUC 263 (1976), for hearing; City of York v. York Telephone and Telegraph Co., 43 Pa. PUC 240 (1967), for briefing; Clepper Farms, Inc. v. Grantham Water Co., 41 Pa. PUC 749 (1965), and have been refused consolidation for any purpose; Dopp v. Williamsburg Borough Dept. of Water and Sewer, 59 Pa. PUC 25 (1984).

In considering the consolidation of cases, the first criteria (set forth in the Commission's regulations) is that the proceedings must involve "a common question of law or fact." An examination of Commission precedent in such cases as Applications of Philadelphia Electric Co., 43 Pa. PUC 781 (1968), Pa. Public Utility Comm'n v. Bell Telephone Co. of Pennsylvania, 46 Pa. PUC 568 (1973), and Pa. Public Utility Comm'n v. Butler Twp. Water Co., 52 Pa. PUC 442 (1978), as well as those cited above, establishes that considerations in addition to the presence of common questions of law or fact must also be evaluated in ruling on a consolidation. These other considerations are:

1. Will the presence of additional issues cloud a determination of the common issues?
2. Will consolidation result in reduced costs of litigation and decision-making for the parties and the Commission?

3. Do issues in one proceeding go to the heart of an issue in the other proceeding?
4. Will consolidation unduly protract the hearing, or produce a disorderly and unwieldy record?
5. Will different statutory and legal issues be involved?
6. Does the party with the burden of proof differ in the proceedings?
7. Will consolidation unduly delay the resolution of one of the proceedings?
8. Will supporting data in both proceedings be repetitive?

No single consideration, nor group of these considerations, is dispositive of a consolidation, any more so than the presence of a common question of law or fact. Rather, the evaluation of all of them and a balancing of those favoring and disfavoring consolidation is required.

In these cases, on balance, consolidation would be advantageous to the proceedings and in the public interest.

Each of the above-captioned Complaints involves the same Complainant, and the same Respondent. They also involve similar questions of law and fact in the form of challenges to UGI's practice of issuing payment arrangements and requesting and handling security deposits. In both Complaints, the Complainant requests that the Commission establish a payment arrangement and ensure that any previous security deposits paid to the Respondent to be applied towards the outstanding balance. The Complainant also requests that the Commission order UGI to stop requiring prohibitive security deposits to keep the service on. Consolidation of the above-captioned Complaints will avoid unnecessary costs and delays to the parties and to the Commission. The witnesses and the evidence on these common issues will be the same so that no confusion will be caused by consolidation. Consolidation will not make the record disorderly or unwieldy.

For all of the stated reasons, consolidation of these cases is warranted and in the public interest.

b) Legal Representation

In its Answer and New Matter, UGI states that customer of record for the three accounts listed in the two consolidated Complaints is Matterns Floral Co. LLC. If it is indeed the case that the Complainant, Matterns Floral, is a limited liability company (LLC) or a corporation, then it is required to be represented by an attorney licensed to practice law in Pennsylvania or admitted *pro hac vice*. 52 Pa. Code §§ 1.21-1.23. An officer of an LLC or corporation cannot represent the corporate entity at a hearing on the complaint in lieu of an attorney. See *Moore v. I. Berman and Cross, Inc.*, 49 Pa. PUC 427, 1975 Pa. PUC LEXIS 25 (Order Entered Sept. 17, 1975).

Consequently, if the Complainant and account holder/customer of record with UGI is an LLC or a corporation, it must have an attorney, licensed to practice law in Pennsylvania or admitted *pro hac vice*, enter his or her appearance in this matter on its behalf by no later than **November 25, 2025**.

THEREFORE,

IT IS ORDERED:

1. That the Complaints filed by Michelle Valentino Bedford on behalf of Matterns Floral against UGI Utilities, Inc. at Docket Nos. C-2025-3056200 and C-2025-3056208 are consolidated.

2. That if the Complainant, Matterns Floral, is a limited liability Company (LLC) or a corporation, it must have an attorney, licensed to practice law in Pennsylvania or admitted *pro hac vice*, enter his appearance in this matter by no later than **November 25, 2025**.

Date: October 16, 2025

_____/s/
Eranda Vero
Administrative Law Judge

C-2025-3056200 - MICHELLE BEDFORD v. UGI UTILITIES INC-ELECTRIC DIVISION

MICHELLE BEDFORD
MATTERNS FLORAL CO LLC
102 LONGFELLOW CLOSE
MOOSIC PA 18507
570.470.4706
michelle@matterns.com
Served via eService October 16, 2025

HAYLEY E WILBURN ESQUIRE
DEVIN T RYAN ESQUIRE
ALICE WADE ESQUIRE
POST & SCHELL PC
ONE OXFORD CENTRE
301 GRANT STREET SUITE 3010
PITTSBURGH PA 15219
412.506.6362
717.612.6052
412.506.6364
hwilburn@postschell.com
dryan@postschell.com
alice.wade@postschell.com
Served via eService October 16, 2025
(Counsel for UGI Utilities Inc.)