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File #: 213675

November 26, 2025

VIA ELECTRONIC FILING

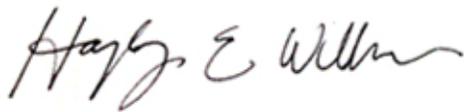
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Hearts of Gold, LLC v. UGI Utilities, Inc. – Gas Division
Docket No. C-2025-3056085**

Dear Secretary Homsher:

Attached for filing is the Motion of UGI Utilities, Inc. – Gas Division to Dismiss the Formal Complaint of Hearts of Gold, LLC in the above-referenced proceedings. Copies are being provided per the Certificate of Service.

Respectfully submitted,



Hayley E. Wilburn

HW/bfc
Attachment

cc: The Honorable Emily A. Farren (*via email; w/attachment*)
Certificate of Service

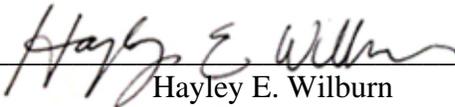
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL AND FIRST-CLASS MAIL

Hearts of Gold
Jasmine White
912 N 3rd Street
Harrisburg, PA 17102
heartsofgoldhc8@gmail.com
jasmine.griffwhite@gmail.com

Date: November 26, 2025



Hayley E. Wilburn

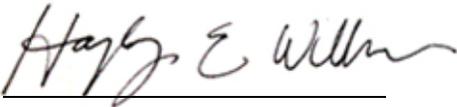
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hearts of Gold, LLC,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056085
	:	
UGI Utilities, Inc. – Gas Division,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE, UNLESS OTHERWISE DIRECTED BY THE PRESIDING OFFICER. YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: November 26, 2025

Counsel for UGI Utilities, Inc. – Gas Division

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Hearts of Gold, LLC,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056085
	:	
UGI Utilities, Inc. – Gas Division,	:	
	:	
Respondent.	:	

**MOTION OF UGI UTILITIES, INC. – GAS DIVISION, TO
DISMISS THE FORMAL COMPLAINT OF JASMINE WHITE**

TO ADMINISTRATIVE LAW JUDGE EMILY A. FARREN:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, UGI Utilities, Inc. – Gas Division, (“UGI Gas” or the “Company”) hereby files this Motion to Dismiss the Formal Complaint filed by Jasmine White on behalf of Hearts of Gold, LLC (“Complainant”) in the above-captioned proceeding, due to her failure to comply with the Commission’s regulations at 52 Pa. Code §§ 1.21 and 1.22, and the Prehearing Order issued on October 31, 2025 by Administrative Law Judge Emily A. Farren. In support of its Motion, UGI Gas states as follows:

I. BACKGROUND

1. On July 3, 2025, UGI Gas was electronically served with the Complaint at C-2025-3056085.
2. UGI Gas filed its timely Answer and New Matter to the Complaint on July 22, 2025. In its New Matter, UGI Gas noted that it appeared the Complaint had been brought on behalf of a corporate entity, specifically, Hearts of Gold LLC. *See* New Matter, ¶ 2.

3. On August 28, 2025, an Initial Telephonic Hearing Notice was served in the above-captioned proceeding, setting an Initial Call-In Telephonic Hearing (“Initial Hearing”) for Friday, October 31, 2025 at 10:00 AM. On August 29, 2025, a Prehearing Order for the Initial Hearing was served.

4. On October 20, 2025, UGI Gas submitted a letter requesting a prehearing conference. The reason for the request was that, upon information and belief, it appeared that the Complaint was brought on behalf of an LLC, specifically, Hearts of Gold, LLC. As an attorney representing the Complainant had not entered an appearance as of the date of the letter, UGI Gas respectfully requested that the Initial Hearing be converted to a prehearing conference, so that parties could discuss how to move forward procedurally.

5. On October 24, 2025, UGI Gas timely filed hearing exhibits.

6. On October 29, 2025, an Interim Order Denying UGI’s Letter Request was issued. The Interim Order denied UGI Gas’s request to convert the Initial Hearing to a prehearing conference, stating that the conversion to a prehearing conference would not appropriately cure the Complainant’s failure to obtain legal counsel or otherwise delineate why legal counsel is not required, because the Complainant had not filed a pleading or response to UGI Gas’s New Matter or letter to explain whether the Complaint had been filed on the her own behalf or on behalf of an LLC.

7. The Interim Order directed the Complainant to either file a pleading explaining why legal counsel is not required, or to cause counsel to enter his or her appearance on the Complainant’s behalf, prior to October 31, 2025. *See*, October 29, 2025 Interim Order, Ordering Paragraph 2.

8. On October 31, 2025, all parties were present at the Initial Hearing. The Complainant represented that the Complaint had indeed been filed on behalf of an LLC, specifically, Hearts of Gold, LLC.

9. The Initial Hearing was rescheduled in order to provide the Complainant with time to obtain counsel.

10. A second Prehearing Order was issued on October 31, 2025. This second Prehearing Order mandated that the Complainant must cause legal counsel to enter his or her appearance on or before 4:30 PM on Tuesday, November 26, 2025, to represent the Complainant. *See*, October 31, 2025 Prehearing Order, Ordering Paragraph 2. The Prehearing Order also noted that no further continuance would be granted in order for the Complainant to obtain legal counsel. *See*, October 31, 2025 Prehearing Order, Ordering Paragraph 4.

11. No attorney licensed to practice in Pennsylvania, or admitted *pro hac vice*, has entered their appearance on the Complainant's behalf as of the date of the instant Motion.

12. For the reasons explained herein, UGI Gas respectfully requests that the ALJ grant the instant Motion and dismiss the Complainants' Formal Complaint with prejudice, due to her failure to comply with the ALJ's October 31, 2025 Prehearing Order directing the Complainant to have an attorney licensed to practice law in Pennsylvania or admitted *pro hac vice*, enter an appearance by no later than November 25, 2025.

II. ARGUMENT

1. The Complainant, Hearts of Gold, LLC, is a corporate entity that is not represented by counsel.

2. The Commission's regulations require corporations to be represented by legal counsel in adversarial proceedings before the Commission. *See* 52 Pa. Code §§ 1.21 and 1.22.

3. It is well established that non-individuals must be represented by counsel at all stages of Commission proceedings once those proceedings become adversarial. *See, e.g., Cars R Us c/o Holman Copeland v. Phila Gas Works*, Docket No. C-2008-2033437, (Order entered Feb. 4, 2010); *Torino Inc. v. PECO Energy Co.*, Docket No. C-2008-2034595, (Order entered Feb. 2, 2010).

4. After UGI Gas filed its Answer and New Matter to the Complaint, this became an adversarial proceeding.

5. No attorney is listed on the Complaint, nor has one entered an appearance to represent the Complainant as of the filing of this Motion.

6. Although the Complainant has had ample time and notice to retain an attorney, as of the date of this motion, no attorney has entered an appearance on behalf of the Complainant in this proceeding.

7. By not retaining an attorney licensed to practice in Pennsylvania, the Complainant has violated the Commission's regulations and the October 31, 2025 Prehearing Order.

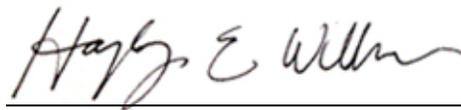
8. It is impermissible for the Complainant to proceed without the representation of an attorney in this matter.

9. Therefore, UGI Gas respectfully requests that the Complaint be dismissed for failure to comply with the Commission's regulations at 52 Pa. Code §§ 1.21 and 1.22 and the October 31, 2025 Prehearing Order, by failing to have an attorney licensed to practice in Pennsylvania enter an appearance in this proceeding.

III. CONCLUSION

WHEREFORE, UGI Utilities, Inc. – Gas Division respectfully requests that Administrative Law Judge Emily A. Farren grant this Motion and dismiss the above-captioned Formal Complaint with prejudice.

Respectfully submitted,



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Date: November 26, 2025

Counsel for UGI Utilities, Inc. – Gas Division