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December 1, 2025

VIA E-FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: UGI Utilities, Inc. – Electric Division’s Biennial Inspection, Maintenance,
Repair and Replacement January 1, 2027, through December 31, 2028,
Inspection and Maintenance Plan at Docket No. M-2009-2094773**

Dear Secretary Homsher:

Enclosed please find the responses of UGI Utilities, Inc. – Electric Division to the Commission’s November 17, 2025 data requests. Confidential material has been submitted on the Commission’s SharePoint site.

Very truly yours,

/s/Lindsay A. Berkstresser
Lindsay Berkstresser
Counsel for UGI Utilities, Inc.

Enclosure

cc: Kriss Brown
Dan Searfoorce
John Van Zant
Brent Killian

UGI Response to:

TUS Data Request 1

UGI Utilities, Inc. – Electric Division’s Biennial Inspection, Maintenance, Repair and Replacement January 1, 2027, through December 31, 2028, Inspection and Maintenance Plan at Docket No. M-2009-2094773

- M-1. UGI-ED’s I&M Plan at Page 11 indicated that, “Further details can be found in UGI Electric’s T&D Engineering Instruction Manual, Section 02-02.” Please provide a copy of Section 02-02 of UGI-ED’s T&D Engineering Instruction Manual (Instruction Manual).
- A-1 Please see Confidential Attachment 1 for UGI Electric’s T&D Engineering Instruction Manual, Section 02-02.

- M-2. UGI-ED’s I&M Plan at Page 15 indicated that, “Further details can be found in UGI Electric’s T&D Utilities Engineering Instruction Manual, Section 02-08.” Please provide a copy of Section 02-08 of UGI-ED’s Instruction Manual.
- A-2 Please see Confidential Attachment 2 for UGI Electric’s T&D Utilities Engineering Instruction Manual, Section 02-08.

- M-3. UGI-ED’s I&M Plan at Page 15 indicated that inspection information is documented. Please explain how this information is documented and provide an example of the documentation completed for a distribution transformer inspection.
- A-3 For background, UGI supplies engineering instructions 2-02 (OH inspection) and 2-08 (transformer inspection) to contractors before the start of the inspection which explains criteria for inspection the equipment. Since the distribution OH transformers are done as part of the distribution OH inspection program, we have inspection records per pole (identified by grid). Contractors will conduct a visual inspection of each asset on the pole and document findings using their own hardware and software. At the end of the inspections, we are supplied with an excel sheet of all results. The inspection results are uploaded into a server and any issues are assigned an engineer or technician to resolve.

Confidential Attachment 3 is an excel showing two inspection records. The first is an example of a transformer with a hot spot identified through inspection and subsequently repaired. The second is an example of a location that has a 2 phase bank on it and no issues were found, passing the inspection with no follow-up required.

- M-4. UGI-ED's I&M Plan at Page 18 indicated that, "Further details can be found in UGI Electric's T&D Engineering Instruction Manual, Section 02-13." Please provide a copy of Section 02-13 of UGI-ED's Instruction Manual.
- A-4 Please see Confidential Attachment 4 for UGI Electric's T&D Engineering Instruction Manual, Section 02-13.

- M-5. The Chart provided on Page 18 of UGI-ED's I&M Plan identified 134 three phase reclosers and 201 single phase reclosers (134+201=335). However, the number of reclosers to be inspected per year on the same charts indicates 346 reclosers. Please clarify this discrepancy.
- A-5. The number in the upper left of the chart is not correct and can be disregarded. Those numbers were related to the 2025-2026 plan mistakenly not updated to reflect current information for the 2027-2028 cycle. UGI plans to inspect 140 Three-phase reclosers and 206 Single phase reclosers for a total of 346 units per year during the 2027-2028 cycle.

- M-6. UGI-ED's I&M Plan at Page 19 indicated that a description of UGI-ED's Substation Inspection Program can be found in UGI-ED's Instruction Manual, Section 4.2. Please provide a copy of Section 4.2 of UGI-ED's Instruction Manual.
- A-6 Please see Confidential Attachment 5 for UGI-ED's Instruction Manual, Section 4.2