

**February 6, 2026**

**VIA E-FILE AND CONFIDENTIAL SHAREPOINT**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17105-3265

RE: TUS Data Request Addressed to Public Utilities Distributing Natural Gas Concern Plastic Pipe Data – 2025.

Dear Mr. Homsher:

This letter provides UGI Utilities, Inc.’s (“UGI” or the “Company”) response to the data request, dated December 16, 2025, from the Pennsylvania Public Utility Commission’s Bureau of Technical Utility Services (“TUS”) regarding data on plastic pipelines. UGI requested from TUS personnel and received approval for an extension to respond to this request by February 6, 2026.

UGI is providing its responses to this request in Confidential Attachment A. The Company would like to note that the numbers reflected in this response represent an approximation based on documented footages of the requested assets that UGI was able to develop given consideration to the following: time of installation, the various historic companies operating these pipe segments, known material purchase history, and historical record keeping of installation standards and practices.

UGI, like most of the natural gas industry, was not required to historically collect detailed information concerning plastic materials such as resin type, pipe material designations (2306, 2406, etc.) or plastic pipe manufacturer date during installation. UGI’s methodology for differentiating vintage plastic components from newer plastic assets accounts for historical industry gaps in record-keeping. Historically, 49 CFR § 192.121 focused primarily on design attributes like hydrostatic design basis (HDB), diameter, and standard dimension ratio (SDR), rather than resin type or pipe manufacturer date. Detailed documentation from the 1970–1980 period, the era when vintage plastics were predominantly installed, is often limited. To overcome these data gaps, UGI utilized a combination of installation years, legacy operating company records, and Subject Matter Expert (SME) knowledge to conservatively estimate its vintage plastic inventory. By correlating available material records with historic installation standards, UGI has categorized all plastic pipelines installed between 1965 and 1985 as either Aldyl A or Plexco, depending on the legacy operating territory. UGI also extended this analysis and review to plastic pipe installed after 1985. Through GIS and historic company records UGI was able to ascertain that medium density 2406 plastic materials were predominantly installed for mains and services lines until 2012. Since this time, UGI has exclusively installed high-density plastic pipe materials (3408/4710). All plastic pipe manufacturers installed during these time frames are also identified in Confidential Attachment A.

Since 2015, UGI has integrated Aldyl-A into its Distribution Integrity Management Program (DIMP) and continues to monitor failure trends for various vintage plastic resins. UGI further refined vintage plastic asset populations to include Plexco plastic pipe and differentiate the various resins and production timeframes of Aldyl A pipe. The following table categorizes UGI’s identified vintage plastic populations based on plastic resin manufacturing periods, PHMSA Advisory Bulletins, and internal records:

DIMP Population Group <sup>3</sup>	PHMSA Advisory Bulletin Reference	UGI Inventory	% of Plastic Distribution System <sup>4</sup>
Century Utility Pipe <sup>1</sup>	ADB-1999-01	0	
Non-LDIW Aldyl A: 1965-1970	ADB-1999-02	<1 mile	0.10%
LDIW Aldyl A: 1970-1974	ADB-2002-07	52 miles	0.60%
PE 3306 Resin Pipe	ADB-2002-07	0	
Driscopipe 8000	ADB-2012-07	0	
1 <sup>st</sup> Gen Plexco Pipe: 1965-1985	ADB-1999-02	497 miles	6.00%
2 <sup>nd</sup> Generation Aldyl A: 1975 - 1985	ADB-1999-02	547 miles	6.60%
Dupont Aldyl A Delrin Tees <sup>2</sup>	ADB-2007-02	61,268 Services	10.80%
Plexco Celcon Cap Tees <sup>2</sup>	ADB-2007-02	19,227 Services	3.40%

**Table 1: Summary of UGI Vintage Plastic DIMP Asset Populations**

- 1: Century Utility products were marketed to mid-west states between 1970-74.
- 2: Estimated number of active services.
- 3: Years identified in this column represent conservative estimates of UGI installation years.
- 4: Based on CY24 DOT Data: 8,239 Miles Plastic Main & 567,587 Active Plastic Services.

In alignment with API 1173 – Pipeline Safety Management Systems, UGI treats DIMP as a continuous improvement cycle. To refine its risk understanding regarding vintage plastic assets, UGI has enhanced its field data collection during opportunistic exposures and maintenance activities. This includes capturing

- Each instance of the installation of an Aldyl-A Tapping Tee repair fitting or Plexco Celcon replacement cap.
- GPS data capture of Aldyl A Delrin or Plexco Celcon retired service tees.
- Material failure forms directly associated to leaking assets.
- Squeeze offs of plastic piping are electronically linked to a GIS main segment.
- Detailed asset attributes whenever plastic pipe is exposed underground.
- Identification of underground heat sources such as steam lines in proximity to all plastic pipelines
  - UGI expedited the remediation of known underground steam line conflicts with UGI vintage plastic assets.

These data driven insights provide UGI a continuous stream of new information that can be utilized through its DIMP to monitor system performance and rank vintage plastic risks against other asset groups, such as bare steel mains or contemporary plastic mains and services. As memorialized in the Third Long Term Infrastructure Improvement Plan (Docket # P-2024-3050769), UGI will target priority plastic replacements as a key component of its ongoing infrastructure modernization strategy.

Please reach out with any further questions,

Sincerely,





Pamela A. Jocsak  
VP EHS & Technical Support  
UGI Utilities, Inc.

Cc: Paul Diskin, TUS  
Matthew Stewart, TUS

## VERIFICATION

I, Pamela A. Jocsak, 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).



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Pamela A. Jocsak  
VP EHS & Technical Support  
UGI Utilities, Inc.