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February 20, 2026

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 v. UGI Utilities, Inc. – Gas Division;
Docket No. R-2025-3059523; **PETITION TO INTERVENE OF THE RETAIL
ENERGY SUPPLY ASSOCIATION**

Dear Secretary Homsher:

Enclosed for filing with the Commission is the Petition to Intervene of The Retail Energy Supply Association (“RESA”) in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a large, stylized blue scribble that extends across the signature line.

Todd S. Stewart
*Counsel for The Retail Energy Supply
Association*

TSS/jld
Enclosure

cc: Legal Assistant, Pam McNeal (via electronic mail – pmcneal@pa.gov)
Legal Assistant, Eric Ball (via electronic mail – erball@pa.gov)
Per Certificate of Service

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).

VIA ELECTRONIC MAIL

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Todd S. Stewart

DATED: February 20, 2026

base rates by approximately \$99.368 million, or by 8.05%. At its February 19, 2026 (a mere one day shy of one year after its most recent previous rate increase request was suspended), Public Meeting, the Commission acted on UGI's request and suspended UGI's requested changes for the maximum statutory time limit.

2. RESA is represented in the above-captioned matter by the following counsel:

Todd S. Stewart
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3. RESA represents several Natural Gas Suppliers that currently serve customers across the full spectrum of customer classes on the UGI system, including residential, commercial, and industrial customers. As such, RESA and its members have a direct and immediate interest in any modifications to any tariff, rule changes or the like, which could impact their ability to serve those customers and they have a clear interest in any tariff provisions, whether new or existing, that directly have impacted or will impact their ability to reasonably and fairly serve customers on the UGI system. As a trade association that represents the interests of competitive suppliers, RESA has standing to participate in this matter.

4. RESA has a has concerns about operational requirements including penalties and application of UGI's curtailment policies and OFO/OMOs. RESA also is concerned that UGI is not timely implementing certain programs to which it agreed in the settlement of its 2025 rate case. Also, RESA is very concerned with the recent Emergency Order that capped price increases for default service, thus further distorting the market. These are in addition to ongoing concerns about interactions with suppliers and general sharing of pertinent information in a timely basis.

5. The Commission's regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having an "interest which may be directly affected, and which is not adequately represented by existing participants and as to which the petitioner may be bound by the action of the Commission in the proceeding." RESA's members serve customers on the UGI system, and are charged fees by UGI as a consequence of that service, and they each also receive services from UGI, which means they all have an interest that will be directly affected by the outcome of this matter, their interests are not represented nor can they be adequately represented by any other party to this proceeding, and they will be bound by any action of the Commission in this proceeding. Because RESA is a trade association that has participated in innumerable Commission proceedings as a trade association comprised of participants in competitive markets its participation is in the public interest. Accordingly, RESA's Petition to Intervene should be granted.

WHEREFORE, RESA respectfully requests that the Presiding Administrative Law Judge and Commission grant their Petition to Intervene in the above-captioned matter and provide them with full party status in this proceeding.

Respectfully submitted,



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DATED: February 20, 2026