



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Susan E. Bruce
Direct Dial: 717.237.5254
sbruce@mcneeslaw.com

March 9, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Application of UGI Utilities, Inc. for (1) Certificate of Public Convenience Evidencing Approval Under 66 Pa. C.S. §§ 1102(a)(3) and 1103(a) for the Transfer of the Auburn City Gate Stations, Located in Auburn Township, Susquehanna County, Pennsylvania, to UGI Auburn Gathering, LLC, an Affiliate of UGI Utilities, Inc.; (2) Approval of the Proposed Transfer of the Auburn City Gate Station Pursuant to 66 Pa. C.S. § 2102(b); and (3) Approval of a Modification of an Existing Affiliated Interest Agreement Pursuant to 66 Pa. C.S. § 2103; Docket Nos. A-2026-3060375; G-2026-3060435; and G-2026-3060551

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) is the Petition to Intervene on behalf of the Procter & Gamble Paper Products Company (“P&G”), in the above-referenced proceeding.

If you have any questions regarding the enclosed documents, please contact the undersigned. Thank you.

Very truly yours,

A handwritten signature in black ink that reads 'Susan E. Bruce'.

Susan E. Bruce
MCNEES WALLACE & NURICK LLC

Counsel to The Procter & Gamble Paper Products Company

SEB/leh

Attachments

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via E-Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of UGI Utilities, Inc. for:	:	
	:	
(1) Certificate of Public Convenience	:	
Evidencing Approval Under 66 Pa. C.S. §§	:	
1102(a)(3) and 1103(a) for the Transfer of the	:	
Auburn City Gate Station, Located in Auburn	:	
Township, Susquehanna County,	:	
Pennsylvania, to UGI Auburn Gathering,	:	Docket No. A-2026-3060375
LLC, an Affiliate of UGI Utilities, Inc;	:	Docket No. G-2026-3060435
	:	Docket No. G-2026-3060551
(2) Approval of the Proposed Transfer of the	:	
Auburn City Gate Station Pursuant to 66 Pa.	:	
C.S. § 2102(b); and	:	
	:	
(3) Approval of a Modification of an Existing	:	
Affiliated Interest Agreement Pursuant to 66	:	
Pa. C.S. § 2103.	:	

**PETITION TO INTERVENE OF
THE PROCTER & GAMBLE PAPER PRODUCTS COMPANY**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 and Section 5.61(a) of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74 and 52 Pa. Code § 5.61(a), and the Commission's Secretarial Letter dated February 10, 2026, The Procter & Gamble Paper Products Company ("P&G" or "Company") hereby files this Petition to Intervene in response to the above-captioned filings of UGI Utilities, Inc.

On February 6, 2026, UGI Utilities, Inc. – Gas Division ("UGI Gas") filed with the Pennsylvania Public Utility Commission ("Commission" or "PUC") an Application for: (1) a Certificate of Public Convenience ("CPC") evidencing approval pursuant to 66 Pa. C.S. §§ 1102(a)(3) and 1103(a) for the transfer of the Auburn City Gate Station, located in Auburn Township, Susquehanna County, Pennsylvania, to UGI Auburn Gathering, LLC ("UGI

Gathering”), an affiliate of UGI Gas; (2) approval of the proposed transfer of the Auburn City Gate Station pursuant to 66 Pa. C.S. § 2102(b); and (3) approval, pursuant to 66 Pa. C.S. § 2103, of a modification to an existing Affiliated Interest Agreement (“AIA”) between UGI Gas and UGI Energy Services, LLC (“UGIES”).¹ Notice of the Application was published in the *Pennsylvania Bulletin* on February 21, 2026, setting March 9, 2026, as the deadline for filing protests and petitions to intervene in this proceeding.

On March 9, UGI Gas filed correspondence with the Commission voluntarily extending the time for P&G to file an intervention or protest by thirty (30) days to afford time to review and, as necessary, resolve certain issues raised by the Application on the regulated service that P&G receives from UGI Gas. Notwithstanding such filing, out of an abundance of caution, P&G files this pro forma intervention in the above-referenced dockets in the event that the Commission does not allow such a voluntary extension. As indicated in UGI Gas’s March 9 request, P&G looks forward to working with UGI Gas to whittle down, if not wholly resolve any P&G concerns with the subject Application. To the extent that P&G and UGI Gas are unsuccessful in resolving all issues, P&G respectfully reserves the right to request that this Petition to Intervene be converted into a Protest, at which time P&G would supplement this filing as necessary.

In support of its Petition to Intervene, P&G asserts the following:

¹ *Application of UGI Utilities, Inc. for (1) Certificate of Public Convenience Evidencing Approval Under 66 Pa. C.S. §§ 1102(a)(3) and 1103(a) for the Transfer of the Auburn City Gate Stations, Located in Auburn Township, Susquehanna County, Pennsylvania, to UGI Auburn Gathering, LLC, an Affiliate of UGI Utilities, Inc.; (2) Approval of the Proposed Transfer of the Auburn City Gate Station Pursuant to 66 Pa. C.S. § 2102(b); and (3) Approval of a Modification of an Existing Affiliated Interest Agreement Pursuant to 66 Pa. C.S. § 2103, Docket Nos. A-2026-3060375, G-2026-3060435, and G-2026-30605510 (filed Feb. 6, 2026) (“Application”).*

1. The name and address of P&G are:

The Procter & Gamble Paper Products Company
1 Procter & Gamble Plaza
Cincinnati, OH 45202

2. The names and addresses of P&G's attorneys are:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. 82039)
Victoria Geddis (Pa. I.D. No. 335500)
McNees Wallace & Nurick LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17101-1166
Phone: (717) 232-8000
E-mail: sbruce@mcneeslaw.com
 cmincavage@mcneeslaw.com
 vgeddis@mcneeslaw.com

3. P&G is a wholly owned subsidiary of The Procter & Gamble Company, an American manufacturer of consumer goods for personal care, health and hygiene, and home care. P&G owns a plant, located near the village of Mehoopany, Pennsylvania ("Mehoopany Plant"), which uses substantial volumes of natural gas in its manufacturing and operational processes, and these natural gas costs are a significant element of P&G's respective costs of operation.

4. UGI Gas is a natural gas distribution company ("NGDC") headquartered in Denver, Pennsylvania. UGI Gas offers natural gas distribution services to retail gas customers in its service territory, which includes P&G. As an NGDC, UGI Gas is fully regulated by the Commission.

5. UGI Gathering is an affiliate of UGI Gas and not regulated by this Commission.

6. On September 1, 2009, UGI Gas and P&G entered into a long-term natural gas delivery service agreement pursuant to Rate XD (Extended Large Firm Delivery Service) of the UGI Gas Tariff ("XD Agreement"). This XD Agreement has been amended over time.

7. The XD Agreement provides for natural gas delivery service, which travels through the Auburn City Gate Station. As part of this proceeding, UGI Gas proposes to transfer this gate station to UGI Gathering, seeks a Certificate of Public Convenience for UGI Gathering, and requests approval of the modification of the aforementioned AIA to account for these changes.

8. The ownership of the Auburn City Gate Station may impact P&G's long-standing XD Agreement with UGI Gas. Additionally, P&G has made significant financial investments in the delivery system surrounding the Auburn Gate Station, which may be affected by the proposed transaction. P&G thus has an interest in this proceeding that is not represented by any other party of record; consequently, P&G satisfies the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

WHEREFORE, The Procter & Gamble Paper Products Company respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, provide P&G with full-party status in this proceeding, and grant such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. 82039)
Victoria Geddis (Pa. I.D. No. 335500)
McNees Wallace & Nurick LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17101-1166
Phone: (717) 232-8000
E-mail: sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com
vgeddis@mcneeslaw.com

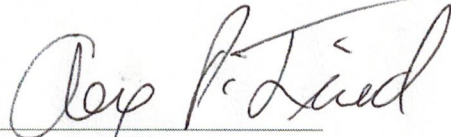
Counsel to The Procter & Gamble
Paper Products Company

Dated: March 9, 2026

VERIFICATION

I, Alex P. Fried, Senior Energy Purchasing Manager at The Procter & Gamble Paper Products Company, hereby state that the facts above set forth in the foregoing document 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).

Dated: March 9, 2026

A handwritten signature in cursive script, appearing to read "Alex P. Fried", written over a horizontal line.

Alex P. Fried

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

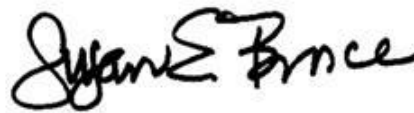
Anthony C. DeCusatis, Esquire
Post & Schell P.C.
17 North Second Street
12th floor
Harrisburg, PA 17101-1601
ADeCusatis@PostSchell.com

Michael S. Swerling, Esquire
UGI Corporation
500 North Gulph Road
King of Prussia, PA 19406
swerlingm@ugicorp.com

Allison Kaster, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

NazArah Sabree
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Daryl Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
ra-oca@paoca.org



Susan E. Bruce

Counsel to The Procter & Gamble
Paper Products Company

Dated this 9th day of March, 2026, at Harrisburg, Pennsylvania