



Eagleview Corporate Center
747 Constitution Drive, Suite 100
P.O. Box 673
Exton, PA 19341
☎ 610.458.7500 📠 610.458.7337

SAMUEL W. CORTES
Direct No: 610.458.4966
Email: scortes@foxrothschild.com

March 30, 2026

VIA ELECTRONIC FILING

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

**Re: Application for UGI Utilities, Inc.
Unopposed Motion for Extension of Time by BKV Operating, LLC to Answer UGI
Gas’s Preliminary Objections
PA PUC - Docket Numbers: A-2026-3060375, G-2026-3060435 and G-2026-3060551**

Dear Secretary Homsher:

Please be advised that this office represents BKV Operating, LLC (“BKV”) , in the above-referenced action. Enclosed for electronic filing is an Unopposed Motion for Extension of Time by BKV Operating, LLC to Answer UGI Gas’s Preliminary Objections.

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Massachusetts Minnesota Missouri
Nevada New Jersey New York North Carolina Oklahoma **Pennsylvania** South Carolina Texas Washington

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March 30, 2026

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If you have any questions with regard to this filing, please do not hesitate to contact me. Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Samuel W. Cortes".

Samuel W Cortes

SWC/tla

Enclosure

cc: Anthony C. DeCusatis, Esquire (w/encl. – via email: adecusatis@postschell.com)
Michael S. Swerling, Esq. (w/encl. – via email: swerlingm@ugicorp.com)
Susan E. Bruce, Esq.; Charis Mincavage, Esq.; Victoria Geddis, Esq.
(w/encl. - via email: sbruce@mcneeslaw.com; cmincavage@mcneeslaw.com;
vgeddis@mcneeslaw.com)
Administrative Law Judge Alphonso Arnold III (w/encl. – via email:
alphonarno@pa.gov)

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, : Docket Number: A-2026-3060375
Pennsylvania, to UGI Auburn Gathering, LLC, :
an Affiliate of UGI Utilities, Inc.; : Docket Number: G-2026-3060435
: :
(2) Approval of the Proposed Transfer of the : Docket Number: G-2026-3060551
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. :

***UNOPPOSED MOTION FOR EXTENSION OF TIME BY BKV
OPERATING, LLC TO ANSWER UGI GAS’S PRELIMINARY OBJECTIONS***

Pursuant to 52 Pa. Code § 1.15, BKV Operating, LLC (*BKV*) moves for a five-day extension of time (12:00 p.m.) to serve an answer to the preliminary objections filed by UGI Utilities, Inc. – Gas Division (*UGI Gas*) on March 27, 2026. BKV conferred with the parties’ counsel prior to filing the instant motion, and all parties indicated that they do not object to this relief. In further support of its motion, BKV states the following.

BACKGROUND

1. This proceeding arises from UGI Gas’s request that the Commission issue an order authorizing it to transfer a natural gas city gate to an affiliated company (and to approve a modification to the related affiliated interest agreement). The request was made via an application to the Commission filed by UGI Gas on February 6, 2026.

2. On March 9, 2026, BKV filed a petition to intervene and protest, arguing, among other things, that the public interest is not served by transfer of the city gate.

3. On or about March 27, 2026, UGI Gas filed preliminary objections to BKV's petition and protest, arguing, among other things, that BKV's protest is legally insufficient and that the Commission does not have subject matter jurisdiction to adjudicate it.

4. Under the Commission's regulation, 52 Pa. Code § 5.101(f)(1), BKV's deadline to answer UGI's Gas's preliminary objections is Monday, April 6, 2026.

5. BKV requests that the Commission extend this deadline by five days—to noon on Friday, April 10, 2026—due to pre-planned family vacations scheduled by BKV and its counsel.

GOOD CAUSE

6. 52 Pa.Code § 1.15(a) provides that the Commission or presiding officer may, for good cause, extend a period of time prescribed by the Commission's rules. *Id.* For briefs, the request for an extension shall be filed five days before the time prescribed. *Id.*

7. Here, good cause exists because the April 6 deadline, if not moved, would considerably disrupt pre-planned, "spring break" vacation and Easter Holiday travel for counsel for BKV. Taylor Speer (BKV's lead counsel), Cordon Smart, and Ashley Beach all have vacation travel planned with their children at some point between the day of this filing and the April 6 deadline.

8. BKV moved expeditiously to support this motion. It appears that UGI Gas's preliminary objections were filed on Friday afternoon, March 27. The next day, Saturday, BKV's counsel requested that UGI Gas and Procter & Gamble consent to a five-day extension. On Monday, March 30, counsel for UGI Gas and Procter & Gamble represented that their respective clients did *not* object to the requested extension.

9. The deadline for filing BKV's answer to UGI's Gas's preliminary objections has not passed, and this motion is made prior to five days from the existing April 6 deadline.

CONCLUSION

10. Based on its demonstration of good cause, BKV requests that the Commission or presiding officer issue an order or Secretarial Letter granting BKV the requested extension to file and serve its answer to UGI Gas's preliminary objection—to noon (12:00 p.m.) on Friday, April 10, 2026.

Dated: March 30, 2026 FOX ROTHSCHILD LLP



Samuel W. Cortes
PA Attorney I.D. No. 91494
Telephone: 610-458-4966
E-Mail: scortes@foxrothschild.com

Ashley L. Beach
PA Attorney I.D. No. 306942
Telephone: 610-458-2997
E-Mail: abeach@foxrothschild.com

747 Constitution Drive, Suite 100
Exton, PA 19341

R. Taylor Speer
(Application for admission *pro hac vice* pending)
Telephone: 864-751-7665
E-Mail: tspeer@foxrothschild.com

Cordon A. Smart
Application for admission *pro hac vice* pending)
Telephone: 336-217-1903
E-Mail: smart@foxrothschild.com

Counsel for BKV Operating, LLC

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an Affiliate of UGI Utilities, Inc.; : Docket Number: G-2026-3060435
: :
(2) Approval of the Proposed Transfer of the : Docket Number: G-2026-30605151
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. :

VERIFICATION

I, Samuel W. Cortes, Partner of Fox Rothschild LLP, hereby state that I am duly authorized to and do make this Verification on behalf of BKV Operating, LLC; that the facts set forth in the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME BY BKV OPERATING, LLC TO ANSWER UGI GAS’S PRELIMINARY OBJECTIONS 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 my statements made herein are subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

FOX ROTHSCHILD LLP



Samuel W. Cortes
PA Attorney I.D. No. 91494

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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 C.S. §2102(b); and :

(3) Approval of a Modification of an Existing :
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 Pa. C.S. §2103. :

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document 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) on March 30, 2026.

Via Electronic Mail

<p>Anthony C. DeCusatis, Esq. Lindsay A. Berkstresser, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101-1601 adecusatis@postschell.com lberkstresser@postschell.com</p> <p><i>Counsel for UGI Utilities, Inc. – Gas Division</i></p>	<p>Susan E. Bruce, Esq. Charis Mincavage, Esq. Victoria Geddis, Esq. McNeese Wallace & Nurick LLC 100 Pine Street, P.O. Box 1166 Harrisburg, PA 17101-1166 sbruce@mcneese.com cmincavage@mcneese.com vgeddis@mcneese.com</p> <p><i>Counsel for Procter & Gamble Paper Products Company</i></p>
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<p>Michael S. Swerling, Esq. UGI Corporation 500 North Gulph Road King of Prussia, PA 19406 swerlingm@ugicorp.com</p> <p><i>Counsel for UGI Utilities, Inc. – Gas Division</i></p>	<p>Administrative Law Judge Alphonso Arnold III alphonarno@pa.gov</p>
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Dated: March 30, 2026



Samuel W. Cortes