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File #: 215708

April 9, 2026

***VIA ELECTRONIC FILING***

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division**  
**Docket No. R-2025-3059523**

Dear Secretary Homsher:

Enclosed for filing is an Answer of UGI Utilities, Inc. – Gas Division in Opposition to Shannon Brown’s Objections and Motion to Amend Protective Order.

Copies will be provided as indicated on the Certificate of Service.

Very truly yours,



Alice A. Wade

AAW/bfc  
Enclosures

cc: Legal Assistant Eric Ball (via email w/ enclosure)  
Legal Assistant Pamela McNeal (via email w/ enclosure)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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).

### VIA EMAIL

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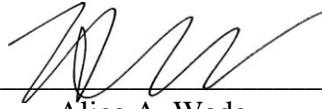
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**VIA EMAIL AND FIRST-CLASS MAIL**

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Date: April 9, 2026

A handwritten signature in black ink, appearing to be 'AAW', is written above a horizontal line.

Alice A. Wade



Case”). The filing was made in compliance with the Commission’s regulations and contains all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

2. On February 3, 2026, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed its Notice of Appearance.

3. On February 6, 2026, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance and a Formal Complaint

4. On February 6, 2026, the Office of Consumer Advocate (“OCA”) filed its Notice of Appearance, a Public Statement, and a Formal Complaint in the 2026 Base Rate Case, which was docketed at Docket No. C-2026-3060342.

5. On February 9, 2026, the OSBA filed a Public Statement, a Formal Complaint, and a Verification in the 2026 Base Rate Case, which was docketed at Docket No. C-2026-3060353.

6. On February 10, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Notice of Appearance Formal Complaint, and Verification in the 2026 Base Rate Case, which was docketed at Docket No. C-2026-3060448.

7. On February 19, 2026, the Commission issued an Order suspending Supplement No. 63 until October 29, 2026, unless permitted by Commission Order to become effective at an earlier date.

8. On February 19, 2026, the Commission issued a Call-In Telephone Prehearing Conference Notice. This issuance scheduled a Telephone Prehearing Conference to occur on March 6, 2026.

9. On February 20, 2026, Administrative Law Judge (“ALJ”) F. Joseph Brady and ALJ Alphonso Arnold III (collectively, “the ALJs”) issued a Prehearing Conference Order. It noted,

If you do nothing after receiving this Prehearing Conference Order, you will be treated as an inactive party to this proceeding. Inactive parties will receive the Presiding Officers’ written orders, notices of hearings, the Recommended Decision and any Commission decisions and orders. Inactive parties will not participate in discovery, testify at the evidentiary hearing, or cross-examine witnesses. Inactive parties will not receive copies of the hearing exhibits or briefs filed by the active participants. You may still attend and testify at a public input hearing as explained in the next paragraph.

Prehearing Conference Order, ¶ 6a.

10. Also on February 20, 2026, The Retail Energy Supply Association (“RESA”) filed a Petition to Intervene.

11. On March 6, 2026, the Prehearing Conference was convened as scheduled. The Complainant did not attend this hearing.

12. On March 9, 2026, Complainant filed a formal complaint relevant to the 2026 Base Rate Case at C-2026-3060342. In Section 3 of the Complaint, the Complainant indicated that the docket number for the 2025 Base Rate Case was R-2025-3059523. However, the Company was not served with the Complaint at this time.

13. On March 13, 2026, following the Prehearing Conference, the ALJs issued a Prehearing Order which listed the active parties to the proceeding as: UGI, OCA, OSBA, I&E, CAUSE-PA, and RESA. Prehearing Order, ¶ 2.

14. Also on March 13, 2026, UGI Gas filed a Motion for Protective Order, and served the same upon the active parties to the proceeding. In this Motion, UGI Gas represented:

UGI Gas has consulted with the active parties and intervenors in this proceeding: the Commission’s Bureau of Investigation and

Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), and The Retail Energy Supply Association (“RESA”). UGI Gas is authorized to represent that I&E, OCA, and CAUSE-PA do not object to the proposed Protective Order. OSBA and RESA have not indicated a position.

Motion for Protective Order, ¶ 8.

15. On March 18, 2026, the Motion for Protective Order was granted in the subject Protective Order.

16. On or about March 20, 2026, the Complainant’s Motion to Amend was filed at this docket, i.e.. R-2025-3059523.<sup>1</sup>

17. On March 23, 2026, UGI Gas’ in-house counsel received a series of discovery requests from the Complainant by email. UGI Gas’ outside counsel was not served with these requests.

18. On March 24, 2026, Complainant filed a procedurally deficient certificate of service for these interrogatories in Docket No. R-2025-3059523 as it was not served on the other parties.

19. On March 24, 2026, UGI Gas received service of the Complainant’s Complaint (“Complaint”) against the rate case.

20. As of the date the instant Answer was filed, UGI Gas has not received service of the Complainant’s Motion to Amend. The certificate of service accompanying the Motion to Amend purports the Complainant effectuated service upon the active parties by way of e-filing the Motion to Amend, purportedly indicating the Complainant was not required to serve the motion

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<sup>1</sup> The electronic docket for this matter indicates a “received on date” of March 20, 2026, and a “post on date” of March 24, 2026.

on the active parties through any other method (e.g., email, first class mail, Federal Express mail, etc.).

21. On April 6, 2026, Complainant filed a Motion to Dismiss Formal Complaint in Docket No. R-2025-3059523, et. al.

## **II. LEGAL STANDARDS**

22. Pursuant to the Commission's regulations, the Commission or presiding officer may grant protective orders to limit the disclosure of trade secrets and other confidential information. 52 Pa. Code § 5.365(a).

23. Such orders, "will be granted only when a party demonstrates that the potential harm to the party of providing the information would be substantial and that the harm to the party if the information is disclosed without restriction outweighs the public's interest in free and open access to the administrative hearing process." *Id.*

24. Pursuant to the Commission's regulations, "[p]leadings, submittals, briefs and other documents, filed in proceedings pending before the Commission shall be served upon parties in the proceeding and upon the presiding officer, if one has been assigned." 52 Pa. Code § 1.54.

25. The Commission's regulations provide that, "[w]ritten motions must contain a notice which states that a responsive pleading shall be filed within 20 days of the date of service of the motion." 52 Pa. Code § 5.103(b). The regulations also require verifications for motions "containing an averment of fact not appearing of record in the action or containing a denial of fact." 52 Pa. Code § 1.36.

26. Further, the Commission's *Interpretation of Procedural Rules Regarding Party Status, Rights and Obligations*, Docket No. M-00061975, provide,

. . . where a party fails to appear at a pre hearing conference, the party has waived the opportunity to so participate and is bound by the decisions made in that pre hearing conference. The pre hearing conference will typically determine, among other things, the list of witnesses, the procedural schedule, ground rules for discovery, and the service list. Parties not appearing at the pre hearing conference, absent valid excuse, would be bound by those determinations, including, for example, their deletion from the service list designated for active participants.<sup>2</sup>

27. Failure to comply with the Commission’s regulations may be cause for striking all or part of a filing. 52 Pa. Code §1.91(b).

### **III. THE COMPLAINANT’S MOTION SHOULD BE DENIED IN ITS ENTIRETY**

#### **A. THE COMPLAINT’S MOTION TO AMEND IS NOW MOOT**

28. UGI Gas incorporates by reference Paragraphs 1 through 27 as if fully set forth herein.

29. The Complainant filed a Motion to Dismiss the Complainant’s own Complaint on or about April 6, 2026. *Pa. PUC, et al., vs. UGI Utilities, Inc. – Gas Division*, Docket No. R-2025-3059523, *et. al.*, Motion to Dismiss Formal Complaint (served on UGI Gas on Apr. 6, 2026) (“Motion to Dismiss”).

30. The Company is in the process of reviewing and evaluating the Complainant’s Motion to Dismiss and will prepare a timely answer thereto wherein the Company plans to not oppose the dismissal of Shannon Brown’s Complainant from the rate case docket and request the related formal complaint docket be dismissed with prejudice.

31. To the extent the Complainant’s Motion to Dismiss is granted and the Complainant is permitted to withdraw the Complaint, the Motion to Amend is moot as the

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<sup>2</sup> *Interpretation of Procedural Rules Regarding Party Status, Rights and Obligations*, Docket No. M-00061975 (Order entered April 18, 2007).

Complainant is no longer a party to the proceeding, active or otherwise, and has signaled an intent not to participate in the proceedings and, therefore, not be bound by the Protective Order.

32. “Where ‘intervening changes in the factual matrix of a pending case’ occur which eliminate an actual controversy and make it impossible for the court to grant the requested relief, the case will be dismissed as moot.”<sup>3</sup>

33. Therefore, as a threshold matter, if the Complainant’s motion to dismiss the Complaint is granted, the controversy regarding the Protective Order has been eliminated, as the Complainant is no longer a party to the case, active or inactive.

34. The Complainant’s Motion to Amend should be dismissed as moot.

**B. THE COMPLAINANT HAS NOT COMPLIED WITH COMMISSION REGULATIONS IN THE SERVICE OF THE SUBJECT MOTION AND THEREFORE THE MOTION TO AMEND IS PROCEDURALLY DEFICIENT**

35. UGI Gas incorporates by reference Paragraphs 1 through 34 as if fully set forth herein.

36. The Prehearing Conference Order made clear the expectations of active parties to the proceeding. Specifically, it indicated an active party:

... will be expected to become familiar with the Commission’s rules of practice and comply with the instructions and deadlines imposed by the orders of the presiding Administrative Law Judges.

Prehearing Conference Order, ¶ 6(c).

37. The Commission’s regulations clearly state that, “[p]leadings, submittals, briefs and other documents, filed in proceedings pending before the Commission shall be served upon

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<sup>3</sup> *Pagnotta v. Pa. Interscholastic Ath. Ass’n*, 681 A.2d 235, 237 (Pa. Cmwlth. 1996) (emphasis added) (quoting *Zemprelli v. Thornburgh*, 466 A.2d 1123, 1124 (Pa. Cmwlth. 1983)).

parties in the proceeding and upon the presiding officer, if one has been assigned.” 52 Pa. Code § 1.54.

38. Here, UGI Gas has still not received service of the Motion to Amend filed by the Complainant. Indeed, UGI Gas only became aware of this Motion to Amend because it was posted at the public docket.

39. Further, the Commission’s regulations provide that, “[w]ritten motions must contain a notice which states that a responsive pleading shall be filed within 20 days of the date of service of the motion.” 52 Pa. Code § 5.103(b).

40. The Motion to Amend contained no such notice, nor did it contain a verification.

41. UGI Gas further notes that the Complainant also attempted to serve UGI Gas with discovery requests, but only effected service in that instance on UGI Gas’ in-house counsel, failing to serve the Company’s outside counsel with the same, as required by the Prehearing Order that established the service list for this proceeding.

42. The Complainant’s inability to follow the Commission’s regulations with regard to the presentation and service of documents is proving habitual.

43. Not only is the Complainant not yet entitled to discovery as an inactive party to the proceeding, but the Complainant has demonstrated that the Complainant should not be made an active party to the proceeding, due to the Complainant’s failure to comply with the Commission’s regulations and orders issued by the ALJs.<sup>4</sup> UGI Gas further notes that this lack of compliance heightens its concerns with respect to the Complainant’s proposed amendments to the Protective Order; indeed, the Complainant’s failure to follow the Commission’s regulations and the orders issued in this matter suggest that, even if the Complainant’s unnecessary and

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<sup>4</sup> Further, the Complainant’s Motion to Dismiss discussed in Section III.A, *supra*, if granted, renders the Motion to Amend moot.

unsupported amendments to the Protective Order are adopted, Complainant may yet fail to comply with the Protective Order.

44. Therefore, because the Motion to Amend failed to conform to the Commission's regulations for presentation and service, the Motion to Amend should be denied.

**C. THE COMPLAINANT IS NOT AN ACTIVE PARTY TO THE COMPLAINT**

45. UGI Gas incorporates by reference Paragraphs 1 through 44 as if fully set forth herein.

46. The Complainant has exhibited a pattern of failing to comply with the Commission's procedural rules. Accordingly, the Complainant's Motion to Amend and interrogatories should be rejected and the Complainant should not be granted anything more than inactive party status in UGI Gas's rate case.

47. The inactive party status is further supported by Complainant's failure to participate in the prehearing conference. The prehearing conference order issued by the ALJs noted:

If you do nothing after receiving this Prehearing Conference Order, you will be treated as an inactive party to this proceeding. Inactive parties will receive the Presiding Officers' written orders, notices of hearings, the Recommended Decision and any Commission decisions and orders. Inactive parties will not participate in discovery, testify at the evidentiary hearing, or cross-examine witnesses. Inactive parties will not receive copies of the hearing exhibits or briefs filed by the active participants. You may still attend and testify at a public input hearing as explained in the next paragraph.

Prehearing Conference Order, ¶ 6a.

48. This is in keeping with the Commission's Interpretation of Procedural Rules Regarding Party Status, Rights and Obligations, Docket No. M-00061975, which provides:

. . . where a party fails to appear at a pre hearing conference, the party has waived the opportunity to so participate and is bound by the decisions made in that pre hearing conference. The pre hearing conference will typically determine, among other things, the list of witnesses, the procedural schedule, ground rules for discovery, and the service list. Parties not appearing at the pre hearing conference, absent valid excuse, would be bound by those determinations, including, for example, their deletion from the service list designated for active participants.<sup>5</sup>

49. The Complainant did not appear at the Prehearing Conference. However, Complainant knew of the rate case docket number when the Complainant filed the Complaint, as it was included therein, and had access to all documents added to the rate case docket on the Commission's website, including the Prehearing Conference Notice.

50. In the Prehearing Order issued by the ALJs following the Prehearing Conference, the active parties to the Complaint are specifically named as UGI, OCA, OSBA, I&E, CAUSE-PA, and RESA. Prehearing Order, ¶ 2.

51. Complainant also never attempted to intervene in the rate case, which evidences the Complainant's intent to be an inactive party participant. The Complainant did not do any of the following, again indicating the Complainant's status as an inactive party is appropriate. The Complainant did not offer any reason for failure to attend the Prehearing Conference.

52. The Complainant did not ask to be designated as active party.

53. The Complainant did not file a Prehearing Conference memorandum.

54. The Complainant waived the right to object to matters decided at the Prehearing Conference.

55. The public docket contains the Orders filed prior to the Complainant's filing of the Complaint. Such Orders make clear the rights of active parties and those of inactive parties.

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<sup>5</sup> *Interpretation of Procedural Rules Regarding Party Status, Rights and Obligations*, Docket No. M-00061975, Order at 12 (entered April 18, 2007).

56. Such Orders also make clear who are currently active parties in this case.

57. While UGI Gas' notice furnished to customers and attached to the Complainant's Motion to Amend indicates that, "[b]y filing a formal complaint, you assure yourself the opportunity to take part in hearing about the rate increase request,"<sup>6</sup> there are multiple ways that customers can take part in hearings, including by being inactive parties that are permitted to participate in public input hearings as discussed in paragraph 9, *supra*. Prehearing Conference Order, ¶ 6a. The Complainant is not, by virtue of filing a Complaint, granted active party status by right. Further, the Complainant's Motion to Dismiss discussed in Section III.A, *supra*, if granted, would remove the Complainant's party status and render the Motion to Amend moot.

58. The Commission expects ALJs, "to use existing case management practices to delete from the service list for active parties those parties, particularly pro se complainants, who have not expressed interest in full participation or are not expected to be active participants."<sup>7</sup>

59. The Complainant's most recent filing, a motion to dismiss the Complainant's own Formal Complaint and terminate the Complainant's "party status" demonstrates that the Complainant has not expressed a desire to be an active party to the proceeding, discussed in Section III.A, *supra*.<sup>8</sup>

60. The Complainant is, therefore, not an active party to the case. As such, the Complainant does not currently have a right to participate in discovery or otherwise challenge the approved Protective Order. Permitting the Complainant discovery rights and access to Confidential information now would allow him to end-run the PUC's process.

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<sup>6</sup> Notice of Proposed Rate Changes.

<sup>7</sup> *Interpretation of Procedural Rules Regarding Party Status, Rights and Obligations*, Docket No. M-00061975, Order at 10 (entered April 18, 2007).

<sup>8</sup> *Pa. PUC, et al., vs. UGI Utilities, Inc. – Gas Division*, Docket No. R-2025-3059523, *et. al.*, Motion to Dismiss Formal Complaint (served on UGI Gas on Apr. 6, 2026).

61. Therefore, the Complainant's Motion and Objections should be denied.

**D. THE COMPLAINANT HAS NOT ALLEGED THAT UGI GAS'S MOTION FOR PROTECTIVE ORDER WAS DEFICIENT**

62. UGI Gas incorporates by reference Paragraphs 1 through 61 as if fully set forth herein.

63. As indicated in paragraph 22, *supra*, pursuant to the Commission's regulations, the Commission or presiding officer may grant protective orders to limit the disclosure of trade secrets and other confidential information. 52 Pa. Code § 5.365(a).

64. Such orders, "will be granted only when a party demonstrates that the potential harm to the party of providing the information would be substantial and that the harm to the party if the information is disclosed without restriction outweighs the public's interest in free and open access to the administrative hearing process." *Id.*

65. The Complainant did not allege, in the Motion to Amend, that the Company has not met this standard. Rather, the Complainant simply argues that the Protective Order, ". . . materially burdens, prejudices, and unjustifiably limits Plaintiff, especially as a so-called non-attorney Party." Motion to Amend, ¶ 6. The Complainant therefore seeks, "amendment throughout the Order stating that any proprietary/classified materials of any type, except *bona fide* Confidential Security Information (see below), must be supplied, without prejudice, to any Party regardless of a Party's 'attorney status'— specifically striking the predicate, 'Party-agreement' prejudice." Motion to Amend, ¶ 9.

66. Complainant supplies no legitimate basis for this proposed amendment to the Protective Order. Importantly, the Protective Order's limitations are consistent in form with a

legion of other Protective Orders issued by the Commission.<sup>9</sup> Complainant supplies no basis for departing from the Commission’s long-standing practice, let alone modify an already effective Protective Order to depart from said practice. Furthermore, while the Complainant attempts to argue that this amendment is necessary to protect the rights of a *pro se* party, this argument is without support. Complainant alleges that the Complainant is a residential customer of UGI Gas, and seeks to participate in this case based upon the impact of UGI Gas’s proposals on the rates the Complainant pays for natural gas distribution service. Complaint, ¶¶1-4. OCA<sup>10</sup> is already participating in this case on behalf of all residential customers impacted by UGI Gas’s proposals, and OCA’s counsel and witnesses have executed the necessary non-disclosure certificates to review this information. Thus, it is not necessary for Complainant to be provided access to this information to vindicate them, or any other residential customer’s interest; OCA is already participating in this matter and has obtained access to this information for this purpose.

67. The Complainant requests an additional revision seeking to minimize classification.<sup>11</sup> Motion to Amend, ¶10. This would upend entirely the classifications commonly accepted in protective orders approved in rate cases before the Commission.<sup>12</sup> Although the

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<sup>9</sup> See *Pa. PUC, et al. v. PPL Electric Utilities Corp.*, Docket Nos. R-2025-3057164, Interim Order Granting Protective Order (Feb. 3, 2026); *Pa. PUC, et al. v. UGI Utilities, Inc. - Gas Division*, Docket Nos. R-2024-3052716, *et al.*, Protective Order (entered Apr. 17, 2025); *Pa. PUC, et al. v. People’s Natural Gas Company, LLC*, Docket Nos. R-2023-3044549, *et al.*, Protective Order (entered Feb. 27, 2024); *Pa. PUC v. Aqua Pennsylvania, Inc.*, Docket Nos. R-2024-3047822, *et al.*, Protective Order (entered Sep. 20, 2024); *Pa. PUC, et al. v. UGI Utilities, Inc. - Gas Division*, Docket Nos. R-2021-3030218, *et al.*, Order Granting Amended Motion for a Protective Order (entered May 24, 2022); *Pa. PUC, et al. v. UGI Utilities, Inc. - Electric Division*, Docket No. R-2021-3023618, Order Granting Motion for Protective Order (entered Apr. 7, 2021); *Pa. PUC v. Aqua Pennsylvania, Inc.*, Docket Nos. R-2021-3027385, *et al.*, Protective Order (entered Oct. 22, 2021); *Pa. PUC, et al. v. UGI Utilities, Inc. - Gas Division*, Docket Nos. R-2019-3015162, *et al.*, Prehearing Order #2 (entered Apr. 24, 2020).

<sup>10</sup> Pursuant to Pennsylvania statute, “. . . the Consumer Advocate is authorized, and it shall be his duty, in carrying out his responsibilities under this act, to represent the interest of consumers as a party, or otherwise participate for the purpose of representing an interest of consumers, before the commission in any matter properly before the commission, and before any court or agency, initiating proceedings if in his judgment such may be necessary, in connection with any matter involving regulation by the commission or the corresponding regulatory agency of the United States whether on appeal or otherwise initiated.” 71 P.S. § 309-4.

<sup>11</sup> With the exception of “*bona fide* Confidential Security Information.” Motion to Amend, ¶10.

<sup>12</sup> See the similar Protective Orders cited in fn. 2.

Complainant argues that such broad disclosure is necessary to ensure consumer oversight over public utilities, advocacy for the interests of consumers is already evidenced by the appearance of statutory advocates in this proceeding, including the Office of the Consumer Advocate, and the ultimate oversight of the Commission. The Protective Order need not be modified to ensure appropriate oversight.

68. The Complainant seeks, in paragraph 12 of the Motion to Amend, a change to language to allow unrepresented Parties' access to Confidential Security Information. Motion to Amend, ¶ 12. This proposal completely ignores the sensitivity of this information, which imposes criminal penalties upon public officials and public employees for improper disclosure,<sup>13</sup> as well as the directives of the ALJs for the parties to limit the disclosure and exchange of this highly sensitive information.<sup>14</sup> Given the particular sensitivity of this information, such an amendment risks compromising such information and should be rejected.

69. The Complainant seeks, in paragraph 13 and 14 of the Motion to Amend, to remove language about what kind of remedies the Company may pursue if Proprietary Information is disclosed and seeks to add language to make such paragraph also apply to a failure to disclose Proprietary Information. Motion to Amend, ¶¶ 13, 14. The rights to dispute the designation of Proprietary Information, however, are already contemplated by Paragraph ¶ 18 of the Protective Order. Thus, the ability to challenge these designations is already available to active parties to the case, consistent with other protective orders issued before the Commission. Complainants' proposed revision is unnecessary and should be denied.

70. Finally, the Complainant seeks a revision that would allow for the disclosure and uploading of Proprietary Information into Artificial Intelligence ("AI") systems. The

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<sup>13</sup> See 35 P.S. § 2141.6.

<sup>14</sup> Prehearing Order, ¶14.

Complainant’s revision, as drafted, would allow parties to use AI systems if, in their judgement, it is reasonable and practical, to summarize and analyze Confidential, Highly Confidential, and Confidential Security Information. The Complainant indicates that this may be a “practical-need.” Motion to Amend, ¶15. That the Complainant believes that processing the data in this way may be a “practical need” demonstrates precisely why disclosure of Proprietary Information to unrepresented parties poses significant risks to the Company while doing little to enhance oversight. The active parties to this proceeding either agreed to this provision or did not state an objection. These parties are staffed with attorneys bound by ethical obligations and have the resources to enlist experts to aid in condensing and interpreting this information. Allowing unrepresented parties who are not bound by the same rules of professional responsibility as attorneys to disclose Proprietary Information to AI systems, in particular AI systems that may retain and incorporate such information into its learning system models, that cannot ensure that such information will remain non-public and confidential creates an entirely unacceptable risk to both the Company, and its customers.<sup>15</sup> Such revisions should be rejected in their entirety.

71. Thus, the Complainant’s Motion should be denied in its entirety.


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<sup>15</sup> Moreover, broad access to Confidential, Highly Confidential, and CSI should not be afforded to an individual Complainant who has already demonstrated an inability to comply with the Commission’s rules and regulations.

**IV. CONCLUSION**

WHEREFORE, UGI Utilities, Inc. – Gas Division respectfully requests that the Pennsylvania Public Utility Commission deny the Objections and Motion to Amend Protective Order filed by Shannon Brown.

Respectfully submitted,



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Dated: April 9, 2026

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Counsel for UGI Utilities, Inc. – Gas Division

**VERIFICATION**

I, Jessica R. Rogers, Vice President, Rates & Regulatory Affairs of UGI Utilities, Inc., 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).

Date: April 9, 2026

Signed by:  
*Jessica Rogers*  
8F3BA1554424EA...  
\_\_\_\_\_  
Jessica R. Rogers