

**BEFORE THE
PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

Pennsylvania Public
Utility Commission,
Shannon Brown, et al.

R-2025-3059523, et al.

v.

UGI Utilities, Inc. – Gas
Division

eFiled

NOTICE

Responsive pleading shall be filed within 20 days of the date of service of the motion. 52 Pa. Code § 1005.71(b).

**Amended
Objections and Motion-to-Amend
Protective Order Dated 2026-03-18**

1. On or after 28 January 2026, Defendant issued a written *Notice of Proposed Rate Changes* (Notice) to Movant-Plaintiff(Plaintiff) in the monthly bill —see Exhibit 1.
2. Notice states persons seeking challenge to the Action must file Complaints before 29 March 2026 to participate in the rate action.
3. Plaintiff timely e-filed a Formal Complaint on 9 March 2026.

4. Defendant filed a *Motion for Protective Order* (Motion) on or about 13 March 2026, 16-days before 29 March 2026.
5. Plaintiff received no notice.
6. The *Protective Order* (dated 18 March 2026) (Order) materially burdens, prejudices, and unjustifiably limits Plaintiff, especially as a so-called non-attorney Party. For example, the Order limits *pro se* Plaintiff-Customer from receiving any proprietary/ classified materials without prior “agreement” of a disclosing party or intervention by this Court. *Order*, ¶9. This limit materially differs from other Parties; in fact, other non-attorney persons associated with a Party have more access than Plaintiff-Customer. See *Order*, ¶9.
7. Thus, Plaintiff objects to the Order issued prior to 29 March 2026, and specifically seeks, at minimum, amendment of the Protective Order

(dated 2026-03-18), consistent with the
29 March 2026 deadline.

8. A public utility party, by definition, stands as a public monopoly. As a public monopoly, the Order must better distinguish mere generalized, non-utility-business concerns such as “competitive disadvantage,” “sensit[ity],” and “proprietary [materials],” e.g., *Order*, ¶3, in a normal business context, from material-and-actual concerns while considering both a disclosing-Party’s public monopoly status and the need for oversight by Plaintiff-Customer.
9. Plaintiff 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.

10. Plaintiff specifically seeks amendment/revision to

¶1: ... **Any public utility party shall minimize classifications as recognizing a compelling need for public oversight of a public monopoly—especially oversight by *bona fide* Customers. As a public monopoly, designations by a public utility party, with exception of *bona fide Confidential Security Information, shall in good-faith presume disclosure and avoid classification as part of a robust, oversight system ...*** [rest of current text].

11. Plaintiff specifically seeks amendment/revision to

¶7: ... CONFIDENTIAL SECURITY INFORMATION will only be provided for inspection via in-person review at the offices of Post & Schell, P.C., 17 N. Second Street, 12th Floor, Harrisburg, PA 1701, or upon request of a statutory advocate or an attorney for a statutory advocate **or by a non-attorney Party using the procedure as**

specified in ¶18 [of the 2026-03-18 dated Order, revise paragraph reference as applicable], at another location at another location in the Harrisburg metro area of the Commonwealth in the Commonwealth of Pennsylvania within the Utility-Defendant's service area, between the hours of 9 A.M. to 5 P.M., Monday through Friday.

12. Plaintiff specifically seeks amendment/revision to

¶13: None of the parties waive their right to pursue any other ~~legal or equitable~~ remedies that may be available in the event of actual or anticipated disclosure of Proprietary Information **or actual or anticipated failure to disclose, or to unnecessarily impede, access to Proprietary Information.**

13. Plaintiff specifically seeks amendment/revision to

¶15: ... ~~None of the parties waive their right to pursue any available remedies that may be available in the event of actual or anticipated~~

~~disclosure of Proprietary Information....~~

(duplicative, however, if retained here, amend as in ¶12 herein).

14. The language in the current Order fundamentally misunderstands contemporary, “AI Systems.” As written, the Order technically bars all or some use of, for example, Microsoft Windows 11 OS, Microsoft Office 365 (e.g., Word and Excel), AppleAI, Google Docs, all modern eDiscovery Systems, many video-conferencing platforms, most smart-phones, OCR/scanning systems, common accessibility/disability assists such as text-to-speech (used by Plaintiff), etc. A Party may have a concern, albeit increasingly outdated, with inadvertent disclosure to generalized, free-tier, publicly-facing, AI Systems. However, the current language unnecessarily restricts most, common, business systems and bars valid AI System usage where a Party may use “cloud” or other hosted architectures that are materially

under a Party's control such as "virtual-private-AI-Systems"—the bar arises from the overbreadth and incorrect assumptions about "third-party," "uploaded," and "retained." These hosted-systems are specifically intended for private-facing-use, not publicly-facing-use. Yet, the current Order's language needlessly restricts any third-party-"uploading" related to any AI Systems.

15. Thus, while Plaintiff disputes the need for such limits, Plaintiff nevertheless specifically seeks amendment/revision to ¶20 to focus on the reality and practicality, not on perceived fear or unwarranted alarmism: **In general, Parties may have concerns about disclosure of electronic CONFIDENTIAL, HIGHLY CONFIDENTIAL, and/or CONFIDENTIAL SECURITY INFORMATION to unauthorized third-parties. Parties shall use reasonable and prudent means, while fairly considering a recipient Party's access to resources and reality of the**

technical landscape, to generally protect electronic, CONFIDENTIAL, HIGHLY CONFIDENTIAL, and/or CONFIDENTIAL SECURITY INFORMATION. In addition, assessment of reasonable and prudent means fully recognizes both a) the legitimate and practical need of a recipient-Party to efficiently retain, analyze, process, summarize, or otherwise use and disclose the electronic PROPRIETARY INFORMATION as part of that processing and part of case preparation, and b) the growing reality of the integration of AI Systems, often beyond the practical control of any recipient-Party, into even common products and services such as, but not limited to, word processing software, video conferencing, and disability assists. Thus, Parties agree to qualified, reasonable-and-prudent efforts; not perfection. As still somewhat new and rapidly changing, Parties

are advised to use caution, and to evaluate the respective data policies and tier-levels before using, common, general, publicly-facing, third-party, artificial intelligence systems (“AI” Systems) such as Grok, ChatGPT, Claude, MistralAI, Gemini, and similar, publicly-facing, systems.


If a hearing should be needed, Movant-Plaintiff requests telephonic/remote appearance as accommodation.

Signed,

A handwritten signature in black ink, appearing to be 'S B', with a long horizontal line extending to the right.

Date 2026-03-20
Amended Date 2026-04-20

Exhibit 1



Notice of Proposed Rate Changes

To Our Customers:

UGI Utilities – Gas Division (UGI or company) is filing a request with the Pennsylvania Public Utility Commission (PUC) to increase your natural gas rates as of March 29, 2026. This notice describes the company's rate request, the PUC's role, and what actions you can take.

UGI Utilities – Gas Division has requested an overall rate increase of \$99.4 million per year. This filing also includes a request for approval of a modification and extension of UGI's existing alternative rate mechanism in accordance with 66 Pa. C.S. § 1330: a Weather Normalization Adjustment pilot mechanism, that would be effective with the November 2027 billing cycle.

If the company's entire request is approved, the total bill for a typical residential heating customer using 68.7 ccf per month would increase from \$113.64 to \$123.55 per month or by 8.7%.

The total bill for a typical commercial heating customer using 26.8 mcf per month would increase from \$336.74 to \$358.17 per month or by 6.4%.

The total bill for a typical industrial customer using 54.6 mcf per month would increase from \$647.57 to \$688.65 per month or by 6.3%.

To find out your customer class or how the requested increase may affect your gas bill, contact UGI Utilities – Gas Division at: 1-800-276-2722. The rates requested by the company may be found in proposed Supplement No. 63 to UGI Gas Tariff Numbers 7 & 7S. You may examine the material filed with the PUC which explains the requested increase and the reasons for it. A copy of this material is kept at UGI's office. Upon request, the company will send you the Statement of Reasons for proposed Supplement No. 63 to UGI Gas Tariff Numbers 7 & 7S, explaining why the rate increase has been requested.

The state agency which approves rates for public utilities is the PUC. The PUC will examine the requested rate increase and can prevent existing rates from changing until it investigates and/or holds hearings on the request. The company must prove that the requested rates are reasonable. After examining the evidence, the PUC may grant all, some, or none of the request or may reduce existing rates.

The PUC may change the amount of the rate increase requested by the utility for each customer class. As a result, the rate charged to you may be different than the rate requested by the company and shown above.

There are ways to challenge a company's request to change its rates:

1. You can file a formal complaint. If you want a hearing before a judge, you must file a formal complaint. By filing a formal complaint, you assure yourself the opportunity to take part in hearings about the rate increase request. All complaints should be filed with the PUC before March 29, 2026. If no formal complaints are filed, the Commission may grant all, some, or none of the request without holding a hearing before a judge. You can send the PUC a letter telling them why you object to the requested rate increase. Sometimes there is information in these letters that makes us aware of problems with the company's service or management. This information can be helpful when we investigate the rate request. Send your letter or request for a formal complaint form to The Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265. Forms may also be downloaded at: <https://www.puc.pa.gov/filing-resources/forms/complaint-forms/>.
2. You can be a witness at a public input hearing. Public input hearings are held if the Commission opens an investigation of the company's rate increase requested and if there is a large number of customers interested in the case. At these hearings you have the opportunity to present your views in person to the PUC judge hearing the case and the company representatives. All testimony given "under oath" becomes part of the official rate case record. These hearings are held in the service area of the company.

For more information, call the PUC at 1-800-692-7380. You may leave your name and address so you can be notified of any public input hearings that may be scheduled in this case.

00321159

52 Pa. Code §§ 1.36, 1001.36

Verification

I, SHANNON BROWN, hereby state that the facts above set forth are true and correct (or 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: 2026-04-XX

Signature:

A handwritten signature in black ink, appearing to be 'S B' with a long horizontal line extending to the right.

Shannon Brown

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 § 1.54 (relating to service by a party). The document was filed electronically on the Commission's electronic filing system.

List of Parties Served

Honorable Administrative Law Judges
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Served via email on 20 April 2026 per
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Dated this 20th day of April, 2026.

A handwritten signature in black ink, appearing to read 'S B', with a long horizontal line extending to the right.

(Signature)
Shannon Brown
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2026-papuc@abbacan.com