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May 26, 2026

**VIA ELECTRONIC FILING**

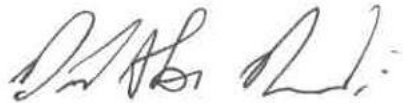
Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: David Romanoski v. UGI Utilities Inc. – Gas Division**  
**Docket No. C-2026-3060818**

Dear Secretary Homsher:

Attached for filing is the Answer to Motion in Limine of UGI Utilities – Gas Division (“UGI Gas”) for the above-referenced proceeding.

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

A handwritten signature in black ink, appearing to read "David Romanoski".

Respectfully submitted,

David Romanoski

# **BEFORE THE**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. C-2026-3060818

David A. Romanoski,  
Complainant

v.

UGI Utilities, Inc. – Gas Division,  
Respondent

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## **ANSWER TO MOTION IN LIMINE**

**TO ADMINISTRATIVE LAW JUDGE ERIN L. GANNON:**

Complainant objects to the expedited nature of the Motion in Limine and notes that the Motion was filed shortly before hearing after exhibits had already been exchanged pursuant to the Prehearing Order. However, Complainant primarily responds that he does not seek adjudication of title or ownership, but instead seeks to present evidence relevant to safety, location, and the absence of documentation provided by UGI.

Complainant, David A. Romanoski, respectfully responds to Respondent's Motion in Limine as follows:

1. Complainant does not seek a determination by the Commission regarding ownership of real property or adjudication of title.
2. Complainant acknowledges that questions regarding easements and ultimate property rights may fall within the jurisdiction of the courts of common pleas.
3. However, evidence regarding the existence or absence of documentation, location information, installation records, and communications with UGI is directly relevant to the issues raised in this proceeding, including:
  - o safe use of the property,
  - o identification of underground facilities,
  - o and UGI's response to repeated requests for information.
4. Complainant intends to present evidence solely for the purpose of demonstrating:
  - o the lack of documentation provided by UGI,
  - o the inability to safely identify and avoid the line,
  - o and the factual background necessary to understand the dispute before the Commission.
5. Complainant does not object to excluding argument requesting the Commission to determine title, ownership, or the validity of any easement.

WHEREFORE, Complainant respectfully requests that the Motion in Limine be denied to the extent it seeks to exclude relevant factual evidence concerning the installation, identification, location, and documentation of the gas line at issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D.A. Romanoski". The signature is written in a cursive, somewhat stylized font.

Date: 5/26/2026

David A. Romanoski

## 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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Date: May 22, 2026 Counsel for UGI Utilities, Inc. – Gas Division

Date: 5/26/2026



David A. Romanoski