



COMMONWEALTH OF PENNSYLVANIA

June 9, 2026

E-FILED

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

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. - Gas Division –
1307(f) / Docket No. R-2026-3062192**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Mark D. Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
: **Docket No. R-2026-3062192**
v. :
:
:
UGI Utilities, Inc. - Gas Division – 1307(f) :

**COMPLAINT OF THE
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

NazAarah Sabree
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

2. The name and address of the Complainant’s attorney is:

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

3. The respondent utility is:

UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. On June 1, 2026, pursuant to Section 1307(f) of the Public Utility Code, UGI Gas Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) submitted the Company’s annual Purchased Gas Cost (“PGC”) Rate pre-filing.

6. UGI Gas’s June 1st filing states that the total natural gas cost for retail customers will increase to \$7.7727 per Mcf on December 1, 2026.

7. Section 1318 of the Public Utility Code, 66 Pa. C.S. § 1318, provides that no rates of a natural gas distribution utility shall be deemed just and reasonable unless the Commission finds that the utility is pursuing a least cost fuel procurement policy, consistent with the obligation to provide safe, adequate, and reliable service. The Commission must find, among other things, that the utility has (1) fully and vigorously represented ratepayer interests before the Federal Energy Regulatory Commission; (2) taken all prudent steps to negotiate favorable gas supply contracts and to relieve its obligations under contracts that may be adverse to ratepayer interests; (3) taken all reasonable steps to obtain lower cost gas supplies; and (4) not withheld or caused to be withheld gas supplies that should have been utilized as part of a least cost fuel procurement policy. 66 Pa. C.S. § 1318(a).

8. The OSBA files this Formal Complaint to ensure that the Company’s purchased gas cost rates are consistent with a least cost fuel procurement policy and do not result in rates and charges that are excessive, unjust, or unreasonable or otherwise contrary to Commission regulation or policy.

9. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- a. Hold evidentiary hearings in accordance with Section 1307(f) of the Public Utility Code;

- b. Deny any proposed rate changes which are not the result of a least cost fuel procurement policy as defined by the standards set forth in Section 1318 of the Public Utility Code, and as defined by other applicable ratemaking standards;
- c. Ensure that the Company's small business customers are not allocated any costs that should not be borne by them;
- d. Deny any rate change that is unjust, unreasonable, unduly discriminatory or contrary to sound ratemaking principles; and
- e. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

For:
NazAarah Sabree

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: June 9, 2026

Consequently, a thorough inquiry by the Public Utility Commission into all the elements of the Company's gas cost rate is necessary to ensure that the utility is pursuing a least cost fuel procurement policy, consistent with the obligation to provide safe, adequate, and reliable service.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed rates in UGI Gas's 2026 PGC Rate filing. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in the Company's present tariffs that apply to small business customers that are not proven by UGI Gas to be lawful, just, reasonable, and non-discriminatory.

Dated: June 9, 2026

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above 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: 06/09/26

NazAarah Sabree

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
: **Docket No. R-2026-3062192**
v. :
:
:
UGI Utilities, Inc. - Gas Division – 1307(f) :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Alphonso Arnold III
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia District Office
801 Market Street, Suite 4063
Philadelphia, PA 19107
alphonarno@pa.gov

The Honorable Barbara Shadie Nause
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia District Office
801 Market Street, Suite 4063
Philadelphia, PA 19107
bshadienau@pa.gov

Adam J. Williams, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
adawilliam@pa.gov

Candis A. Tunilo, Esquire
UGI Corporation
1 UGI Drive
Denver, PA 17517
tuniloc@oneugi.com

Harrison W. Breitman, Esquire
Olivia M. Spergel, Esquire
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
HBreitman@paoca.org
OSpergel@paoca.org

Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101
LBerkstresser@PostSchell.com

Alice A. Wade, Esquire
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Alice.Wade@PostSchell.com

Date: June 9, 2026

/s/ Steven C. Gray _____

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538