



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 10, 2026

**Via Electronic Filing**

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  
**I&E Prehearing Memorandum**

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Williams', is written over a white background.

Adam J. Williams  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 310019  
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AJW/nb  
Enclosures

cc: Administrative Law Judge Alphonso Arnold, III (via email – [alphonarno@pa.gov](mailto:alphonarno@pa.gov))  
Administrative Law Judge Barbara Shadie Nause (via email – [bshadienau@pa.gov](mailto:bshadienau@pa.gov))  
Per Certificate of Service



On May 7, 2026, the Office of Consumer Advocate (OCA) filed a complaint and appearances. Adam J. Williams of I&E entered his appearance on May 8, 2026. Steven C. Gray for the Office of Small Business Advocate (OSBA) filed his appearance on May 15, 2026. A prehearing conference is scheduled for Friday, June 12, 2026 at 10:00 A.M. with Administrative Law Judges Alphonso Arnold, III and Barbara Shadie Nause (“The ALJS”) presiding. I&E submits this Prehearing Memorandum in compliance with the Prehearing Conference Order of June 5, 2026.

## **II. ISSUES**

The following list represents I&E’s preliminary determination of the potential issues in this case:

- 1) Peaking Contracts
- 2) C-Factor
- 3) E-Factor
- 4) Supplier Refunds
- 5) Pipeline Refunds
- 6) Over/Under Collections
- 7) Retainage Rate
- 8) Unaccounted for Gas
- 9) Capacity Release
- 10) Capacity Requirements
- 11) Peak Day Forecasts
- 12) Renewable Natural Gas
- 13) Compliance with Prior Commission Orders
- 14) Off-System Sales

The list is as complete as can be made at this time. I&E reserves the right to address other issues, as it deems appropriate if any such relevant issues arise.

### **III. WITNESSES**

I&E expects to call the following expert witnesses at these dockets without being limited thereto:

- Christopher Keller, Fixed Utility Financial Analyst
- Ethan Cline, Fixed Utility Valuation Engineer

I&E witnesses may be contacted through the information listed above for Mr. Williams. The witness list is provided without the benefit of complete discovery or analysis of the positions of other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the names of the witnesses listed above.

### **IV. EVIDENCE**

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports. However, there may be issues of Commission policy or legal representation that are not properly the subject of testimony or there may be factual issues that are clear on the record and need not be supported by testimony. I&E reserves the right to dispense with testimony, when, in its opinion, an issue can be adequately addressed through briefing.

**V. DISCOVERY**

Due to the time limitations in the proceedings, I&E requests that the Commission’s Rules of Practice and Procedure for the conduct of discovery be modified as follows:

1. Answers to written interrogatories shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories shall be communicated orally to the opposing party within three (3) calendar days of service; unresolved objections shall be served to the other party in writing within five (5) days of service of interrogatories.
3. Motion to dismiss objections and/or direct the answering of interrogatories shall be filed within five (5) calendar days of service of written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of such motions.
5. Discovery or discovery-related pleadings served after 12:00 noon on a Friday or after 12:00 p.m. on any business day preceding a state holiday will be deemed to be served on the next business day.

**VI. SCHEDULE**

I&E is committed to cooperating with all parties and The ALJS to finalize an acceptable procedural schedule. Consistent with discussion among the parties thus far, I&E proposes the following schedule:

<u>Date</u>	<u>Event</u>
Wednesday, July 1, 2026	Written Direct Testimony of All Non-Company Parties
Wednesday, July 15, 2026	Written Rebuttal Testimony of All Parties
Wednesday, July 22, 2026	Written Surrebuttal Testimony of All Parties
Monday, July 27, 2026	Oral Rejoinder Outline, Witness Matrix
Wednesday, July 29, 2026	Telephonic Evidentiary Hearing
Tuesday, August 11, 2026	Main Briefs Due
Friday, August 21, 2026	Reply Briefs Due

## VII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E proposes to both only serve and accept electronic delivery of documents. If The ALJS and/ or any party prefers to have additional service (or “hard copies”) of documents by mail, I&E will certainly provide such service.

## VIII. SETTLEMENT

I&E intends to participate in any settlement discussions and is willing to work with the parties to reach a resolution of any or all issues. In the event settlement discussions fail to result in a complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding as warranted.

Respectfully Submitted,



Adam J Williams  
Prosecutor  
PA Attorney ID No. 310019

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Dated: June 10, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated June 10, 2026, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

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