



COMMONWEALTH OF PENNSYLVANIA

June 10, 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 for filing please find the Prehearing Memorandum, 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: Maksim Malukoff / Mark D. Ewen
Parties of Record

1307(f), UGI Utilities, Inc. – Gas Division (“UGI Gas” or the “Company”) submitted the Company’s annual Purchased Gas Cost (“PGC”) rate filing.

The OSBA filed a Complaint on June 9, 2026.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mark Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mewen@indecon.com

Maksim Malukoff
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mmalukoff@indecon.com

The OSBA will participate in this proceeding to ensure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by UGI Gas, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) Whether UGI Gas is appropriately mitigating unaccounted-for gas levels on its system.
- (2) Whether the Company’s design day demand forecasting and peak day capacity requirements are reasonable.
- (3) Whether the Company’s gas supply procurement and price hedging strategy is reasonable.
- (4) Whether the Company’s gas supply mix and strategy for basin diversification are reasonable.

- (5) Whether the Company's strategy for capacity release, off-system sales, asset management arrangements, and storage fill agreement is reasonable.
- (6) Whether the Company's contracts with pipelines and suppliers are reasonable and prudent.
- (7) Whether the Company's consideration of certified natural gas supply is worthwhile.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement.

The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. DISCOVERY

The OSBA does not propose any discovery modifications.

VI. SETTLEMENT

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of this proceeding.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are discussing a proposed procedural schedule.

Respectfully submitted,

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

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

Dated: June 10, 2026

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 10, 2026

/s/ Steven C. Gray _____

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