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File #: 219168

June 12, 2026

VIA ELECTRONIC FILING

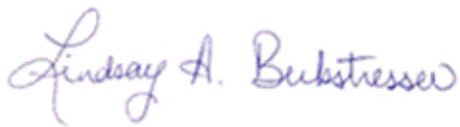
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: UGI Utilities, Inc. – Electric Division to Modify Its Default Service Supplier
Master Agreement and Seeking Expedited Commission Action
Docket No. P-2024-3049343**

Dear Secretary Homsher:

Please let this letter serve as notice that we have provided the Bureau of Investigation and Enforcement a copy of the attached Petition of UGI Utilities, Inc. – Electric Division to Modify Its Default Service Supplier Master Agreement and Seeking Expedited Commission Action in the above-captioned proceeding.

Respectfully submitted,



Lindsay A. Berkstresser

LAB/sll
Attachment

cc: Certificate of Service

**AMENDED
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 E-MAIL

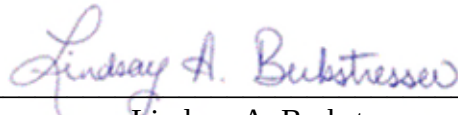
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Date: June 12, 2026



Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Utilities, Inc. – Electric :
Division For Approval Modify Its : Docket No. P-2026-_____
Default Service Supplier Master : Docket No. P-2024-3049343
Agreement :

**PETITION OF UGI UTILITIES, INC. – ELECTRIC DIVISION
TO MODIFY ITS DEFAULT SERVICE SUPPLIER MASTER AGREEMENT AND
SEEKING EXPEDITED COMMISSION ACTION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

UGI Utilities, Inc. – Electric Division (“UGI Electric” or “Company”) hereby files this Petition with the Pennsylvania Public Utility Commission (“Commission”) pursuant to Sections 5.41 and 54.186(d) of the Commission’s regulations, 52 Pa. Code §§ 5.41 and 54.186(d), seeking approval to modify the Company’s Default Service Supplier Master Agreement (“SMA”) in order to allow Global Systematically Important Banks (“GSIBs”) to participate in the Company’s wholesale default supply auctions. Specifically, UGI Electric is requesting approval to add Appendix I to its SMA, which is provided as Attachment A to this Petition. Appendix I will incorporate the International Swaps and Derivatives Association, Inc. 2018 U.S. Resolution Stay Protocol (“ISDA U.S. Stay Protocol”) into the SMA which is necessary in order for GSIBs to participate in the Company’s wholesale default supply auctions. Allowing GSIBs to participate in the wholesale auctions will permit these additional, well-qualified parties to compete and bid in the wholesale auctions, thereby expanding the scope of eligible bidders. The Commission recently approved a similar request for PECO Energy Company. *See PECO Energy Company For*

Approval to Modify its Default Service Supplier Master Agreement, Docket No. P-2023-3045119, Order entered February 1, 2024.

UGI Electric is aware of one potential supplier that cannot participate in the Company's wholesale auctions without adoption of the requested changes herein. It is also UGI Electric's understanding based upon PECO's filing that GSIBs are active in the energy markets and that certain GSIBs participated in PECO's default supply auctions prior to the adoption of the U.S. Stay Regulations.

UGI Electric seeks Commission approval of this Petition by June 26, 2026, so that GSIBs are able to participate in the Company's wholesale default supply auction scheduled for July 30, 2026. UGI Electric has consulted with all parties in the Company's Default Service Proceeding ("DSP V") for the period of June 1, 2025 – May 31, 2029 and none of these parties object to this filing.

In support of the Petition, UGI Electric states as follows:

II. DISCUSSION

1. UGI Electric is a "public utility", an "electric distribution company" ("EDC") and a "default service provider" as defined in Sections 102 and 2803 of the Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

2. UGI Electric provides electric distribution service to approximately 62,000 customers in portions of two northeastern Pennsylvania counties (Luzerne and Wyoming Counties), and since the expiration of its generation rate cap in 2002, has served as the default service provider for its electric distribution system.

3. On May 31, 2024, UGI Electric filed its most recent default service plan with the Commission seeking approval of the Company's plan to provide default service to customers for

the period of June 1, 2025 through May 31, 2029 (“DSP V”) at Docket Nos. P-2024-3049343 and G-2024-3049351.

4. In the DSP V proceeding, the Company sought Commission approval of its SMA, which is the agreement under which the Company procures default supplies from wholesale suppliers.

5. The Company entered into a non-unanimous settlement (“Settlement”) of that proceeding with the Office of Consumer Advocate (“OCA”) and the Office of Small Business Advocate (“OSBA”). Under the Settlement of that proceeding, the Company sought approval of the bid documents that were included with the filing, which included the SMA. See Settlement ¶ 29.

6. The Commission approved the Settlement by Order dated February 20, 2025.¹

7. The SMA incorporated into the Settlement is a relatively standard EEI agreement that the Company has been using for many years to define the contractual relationship between UGI Electric and wholesale suppliers. Under the SMA, a wholesale supplier is required to provide supply for the Company’s default service load. The SMA includes contract provisions related to the amount of supply to be provided, the products to be included with the supply, the price for supply, payment requirements, credit and collateral requirements and other obligations. The Commission-approved SMA is used by UGI Electric in its wholesale supply auctions.

8. Recently, UGI Electric has been approached by a GSIB seeking to participate in UGI Electric’s wholesale auctions for default supply. The GSIB advised the Company that the

¹ On March 13, 2026, the Commonwealth Court affirmed the Commission’s February 20, 2025 Opinion and Order. See *Penn Renewables, LLC v. Pennsylvania Public Utility Commission*, 337 C.D. 2025 (March 13, 2026).

Company would need to adhere to the ISDA U.S. Stay Protocol in order for the GSIB to bid in the wholesale auction.

9. GSIBs are extremely large financial institutions whose failure could trigger a broad financial crisis and threaten the global economy. As a result, GSIBs are subject to higher capital requirements and more stringent stress tests than regular financial institutions. GSIBs are closely monitored by credit ratings agencies and have some of the highest credit ratings available. The Financial Stability Board has identified a list of 29 GSIBs in 2025.² Examples of GSIBs include JPMorgan Chase, Citigroup and Bank of America among others.

10. GSIBs are subject to extensive regulations including regulations issued by the Board of Governors of the Federal Reserve System (12 C.F.R. §§ 252.2, 252.81-88), the Federal Deposit Insurance Corporation (12 C.F.R. §§ 382.1-7) and the Office of the Comptroller of Currency (12 C.F.R. §§ 47.1-8) (“U.S. Stay Regulations”). The U.S. Stay Regulations impose requirements on the terms of swaps and other qualified financial contracts of GSIBs.

11. Given the importance of GSIBs to the global banking system, they are not subject to typical bankruptcy rules. GSIBs can only execute contracts with counterparties that agree to be subject to the ISDA U.S. Stay Protocol. This Stay Protocol allows bank regulators time to manage a potential crisis by imposing stays on parties’ rights to terminate contracts. The 48-hour stay period is designed to provide a stable environment for the orderly transfer of troubled banks’ contracts to prevent a potential broader collapse. All counter-parties to a GSIB qualified financial contract are subject to the same stay requirement.

² <https://www.fsb.org/2025/11/2025-list-of-global-systemically-important-banks-g-sibs/>

12. The GSIB regulation regime does not invalidate an otherwise enforceable contract or security interest in any collateral taken to secure performance under the qualified contract, and the regulation regime does not permit the GSIB to fail to pay or perform under a qualified contract.

13. GSIBs are currently not able to participate in the Company's default supply auctions due to the lack of a ISDA U.S. Stay Protocol provision. Granting this Petition will allow more well-qualified bidders to participate in the default supply auctions,

14. GSIBs will be subject to all other provisions of the Company's SMA and other bidder requirements, including credit and collateral requirements.

15. UGI Electric has consulted with its auction manager, NERA Economic Consulting ("NERA"), and NERA supports this Petition. NERA also has had prior experience working with GSIBs.

16. As noted above, one GSIB has expressed interest in bidding in UGI Electric's wholesale auctions, and UGI Electric understands that GSIBs have participated in PECO's default supply auctions.

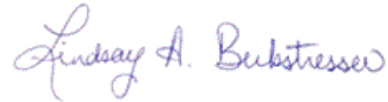
17. UGI Electric has advised the Bureau of Investigation & Enforcement, the OCA, the OSBA and all other parties that participated in the Company's most recent default service proceeding of this Petition. All of these parties have indicated that they have no objection to this Petition.

III. CONCLUSION

WHEREFORE, UGI Utilities Inc, - Electric Division respectfully requests that the Pennsylvania Public Utility Commission grant this Petition, on an expedited basis, approving a modification to the Company's Default Supply Master Agreement to allow Global Systematically Important Banks to participate in wholesale default supply auctions. UGI Electric respectfully

requests the Commission issue a decision by June 26, 2026, in order to incorporate the requested changes in the Company's wholesale default supply auction scheduled for July 30, 2026.

Respectfully submitted,



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Date: June 8, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of UGI Utilities, Inc. – Electric :
Division For Approval Modify Its : Docket No. P-2026-_____
Default Service Supplier Master :
Agreement :

VERIFICATION

I, Jessica Rogers, being the VP - Rates & Regulatory Affairs at UGI Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect UGI Corporation 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: 6/9/2026

Signed by:
Jessica Rogers
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**UGI UTILITIES, INC. – ELECTRIC DIVISION
MASTER POWER PURCHASE & SALE AGREEMENT**

APPENDIX I

ADHERENCE TO THE U.S. STAY PROTOCOL

The Parties may, by mutual agreement, execute this Appendix I for purposes of incorporating the International Swaps and Derivatives Association (“ISDA”) 2018 U.S. Resolution Stay Protocol into this Master Power Purchase & Sale Agreement.

This Appendix I is part of the Master Power Purchase & Sale Agreement dated _____, 20__ between UGI Utilities, Inc. (the “Buyer”) and _____ (the “Seller”).

Seller hereby confirms that it is an adherent to the ISDA 2018 U.S. Resolution Stay Protocol (“ISDA Stay Protocol”). Buyer confirms that it is or that it will become an adherent to the ISDA Stay Protocol. If Buyer is not an adherent to the ISDA Stay Protocol when this Appendix I is executed, Buyer will submit an Adherence Letter for acceptance by the ISDA no later than ten (10) Business Days after execution of this Appendix I.

The terms of the ISDA Stay Protocol are incorporated into and form a part of the Master Power Purchase & Sale Agreement, and the Master Power Purchase & Sale Agreement shall be deemed a Protocol Covered Agreement for purposes thereof. For purposes of incorporating the ISDA Stay Protocol, Seller shall be deemed to be a Regulated Entity and Buyer shall be deemed to be an Adhering Party. In the event of any inconsistencies between the Agreement and the ISDA Stay Protocol, the ISDA Stay Protocol will prevail.

The terms “Regulated Entity”, “Adhering Party”, “Adherence Letter” and “Protocol Covered Agreement” shall have the meanings given to them in the ISDA Stay Protocol. All other terms not defined herein shall have the meanings given to them in the Master Power Purchase & Sale Agreement between the Parties.

UGI UTILITIES, INC. (BUYER) _____ (SELLER)

By: _____ By: _____

Name: _____ Name: _____

Title: _____ Title: _____