



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

June 25, 2026

Docket Nos. A-2026-3062711  
A-2026-3062887  
A-2026-3062889

**CERTIFIED**

TODD S STEWART ESQ  
HMS LEGAL LLP  
501 CORPORATE CIR STE 302  
HARRISBURG PA 17110

Re: Application of Sigel Gas LLC For Commission Approval of the Transfer of its Distribution System Assets to Utility Pipeline Ltd. and immediately thereafter to Knox Energy Cooperative Association, Inc., a Bona Fide Cooperative, and for the Abandonment of all Pennsylvania Regulated Service by Sigel Gas LLC, with the Immediate Commencement of Service by Knox Energy Cooperative Association, Inc.

Dear Mr. Stewart:

On May 18, 2026, Sigel Gas LLC's above-referenced filing was accepted for filing with the Pennsylvania Public Utility Commission (Commission). The filing was incomplete. In order for us to complete our analysis of your application, the Energy Industry Group requires answers to the attached questions. Please be advised that you are directed to forward the requested information to the Commission within **30** days of receipt of this letter.

The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response and mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

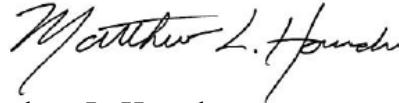
**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], 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 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).*

Signature \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

To expedite the company's responses, please also send a copy of your submission to Lee Yalcin at [lyalcin@pa.gov](mailto:lyalcin@pa.gov). If any problems arise that prevent a full timely response or if any clarification of these data requests is needed, please contact Lee Yalcin of the Bureau of Technical Utility Services via e-mail at [lyalcin@pa.gov](mailto:lyalcin@pa.gov) (preferred) or (717) 787-6723.

Sincerely,



Matthew L. Homsher  
Secretary

Sigel Gas LLC  
Docket Nos. A-2026-3062711  
A-2026-3062887  
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Data Requests

Reference: Application of Sigel Gas LLC For Commission Approval of the Transfer of its Distribution System Assets to Utility Pipeline Ltd. and immediately thereafter to Knox Energy Cooperative Association, Inc., a Bona Fide Cooperative, and for the Abandonment of all Pennsylvania Regulated Service by Sigel Gas LLC, with the Immediate Commencement of Service by Knox Energy Cooperative Association, Inc.

1. Please provide the current number of active customers served by the Sigel Gas LLC (Sigel Gas) system, broken out by customer class.
2. Please provide copies of any appraisal, engineering valuation, feasibility study, due diligence report, or other analysis prepared in connection with Knox Energy Cooperative Association, Inc.'s (Knox Energy) acquisition of the Sigel Gas system.
3. Please provide five-year financial projections for the acquired Sigel Gas system, including projected revenues, expenses, capital expenditures, debt obligations, and cash balances.
4. Please identify all material liabilities associated with the Sigel Gas system, including environmental liabilities, remediation obligations, pending litigation, contingent liabilities, and other known financial obligations.
5. Please provide a comparison of current Sigel Gas rates and charges to the rates and charges that will apply to customers following conversion to Knox Energy membership, by customer class.
6. Please explain the anticipated financial impact on Knox Energy if customer counts decline or gas throughput decreases significantly, including any assumptions regarding system sustainability and cost recovery.
7. Please explain whether former Sigel Gas customers will retain the ability to discontinue membership in Knox Energy while continuing to receive natural gas service and describe the consequences of terminating membership.
8. Please state whether any rate increases, fees, assessments, or other customer charges are anticipated during the first five years following the acquisition. If so, please identify the anticipated timing and provide the estimated increase in both percentage and dollar terms.

9. Please provide copies of Knox Energy's current bylaws, rules and regulations, membership requirements, service agreements, and any other governing documents applicable to members receiving natural gas services.
10. Please identify and explain all membership fees, deposits, connection charges, assessments, capital credits, or other charges that former Sigel Gas customers may be required to pay upon becoming members of Knox Energy.
11. The maps provided by Sigel Gas are insufficiently detailed to allow Staff to determine the location and extent of the company's facilities or the customers served by those facilities. Please provide detailed system maps identifying all distribution facilities, including mains, service lines, regulator stations, meters, customer service locations, municipal boundaries, pipe materials, pipe ages, pipeline mileage, and any other facilities necessary for Staff review.
12. Please identify all known safety deficiencies, compliance issues, deferred maintenance items, outstanding corrective actions, and reportable leak conditions associated with the Sigel Gas system.
13. Please explain how emergency response activities will be conducted following the acquisition, including the location of the nearest response personnel, equipment, and operating facilities serving Jefferson County.
14. Please provide the staffing levels, organizational structure, and qualifications of personnel who will operate, maintain, and manage the system following the acquisition.
15. Please explain how customer service, complaint handling, billing, collections, and outage communications will be administered following the acquisition.
16. Please identify all planned capital projects, reliability improvements, safety enhancements, and infrastructure replacement projects anticipated during the first five years following the acquisition.
17. Please explain whether any changes to existing gas supply arrangements, transportation agreements, storage arrangements, or procurement practices are anticipated following the acquisition.
18. Please identify any customers who have objected to, or expressed concerns regarding, or otherwise, opposed the proposed transfer.