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August 5, 2026

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

Re: Joint Application of UGI Utilities, Inc. And Argo Infrastructure Partners LLC for a Certificate of Public Convenience under Chapter 11 of the Public Utility Code and All other necessary approvals (i) for the conversion of UGI Utilities, Inc. To UGI Utilities, LLC, (ii) to effect a division of the assets and liabilities of UGI Utilities, LLC, (iii) to establish a new entity to own and operate the assets of UGI Utilities, LLC – Electric Division and provide retail electric service as a public utility, (iv) for the sale and transfer of the Membership purchase interests in the new entity to a new Limited Liability Company to be formed, owned and controlled by an affiliate of ARGO Infrastructure Partners LLC, and (v) for the Cessation and Abandonment of any and all Retail Electric Service in Pennsylvania for UGI Utilities, Inc.

Docket Numbers: A-2026-3063610, A-2026- 3063612 and A-2026-3063614

Dear Secretary Homsher:

This is in regard to the Protest filed by the Office of Consumer Advocate (“OCA”) dated July 27, 2026 in connection with the above captioned proceeding. While Answers to Protests are not required to be filed under the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 1.1 *et seq.*, the election of UGI Utilities, Inc and Argo Infrastructure Partners LLC – the Joint Applicants -- to not file an Answer to the OCA Protest should not be construed as concurrence in the grounds of, or the issues addressed in, the Protest.

Thank you for your attention to this matter.

Sincerely,

BUCHANAN INGERSOLL & ROONEY PC

By:   
Alan M. Seltzer, Esquire

AMS/psm  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT APPLICATION OF UGI UTILITIES, INC. :  
AND ARGO INFRASTRUCTURE PARTNERS LLC :  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE :  
UNDER CHAPTER 11 OF THE PUBLIC UTILITY :  
CODE AND ALL OTHER NECESSARY :  
APPROVALS (I) FOR THE CONVERSION OF UGI :  
UTILITIES, INC. TO UGI UTILITIES, LLC, (II) TO :  
EFFECT A DIVISION OF THE ASSETS AND :  
LIABILITIES OF UGI UTILITIES, LLC, (III) TO :  
ESTABLISH A NEW ENTITY TO OWN AND : **DOCKET NO. A-2026-3063610**  
OPERATE THE ASSETS OF UGI UTILITIES, LLC – :  
ELECTRIC DIVISION AND PROVIDE RETAIL : **DOCKET NO. A-2026-3063612**  
ELECTRIC SERVICE AS A PUBLIC UTILITY, (IV) :  
FOR THE SALE AND TRANSFER OF THE : **DOCKET NO. A-2026-3063614**  
MEMBERSHIP PURCHASE INTERESTS IN THE :  
NEW ENTITY TO A NEW LIMITED LIABILITY :  
COMPANY TO BE FORMED, OWNED AND :  
CONTROLLED BY AN AFFILIATE OF ARGO :  
INFRASTRUCTURE PARTNERS LLC, AND (V) :  
FOR THE CESSATION AND ABANDONMENT OF :  
ANY AND ALL RETAIL ELECTRIC SERVICE IN :  
PENNSYLVANIA FOR UGI UTILITIES, INC. :**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the attached document on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA FIRST CLASS MAIL AND ELECTRONIC MAIL**

Darryl A. Lawrence, Esquire  
Steven Gray, Esquire  
Christy Appleby, Esquire  
Jacob Guthrie, Esquire  
Katherine Kennedy, Esquire  
Johnathan Longhurst, Esquire  
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BUCHANAN INGERSOLL & ROONEY PC



Dated: August 5, 2026

By: \_\_\_\_\_  
Alan M. Seltzer, Esquire