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August 18, 2026

VIA ELECTRONIC FILING

Matthew L. Homser, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
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 Nos. A-2026-3063610, A-2026-3063612 and A-2026-3063614; **AMENDED PETITION TO INTERVENE OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Amended Petition to Intervene of the Retail Energy Supply Association ("RESA") in the above-captioned proceeding. Copies of this Petition have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A large, stylized handwritten signature in blue ink, appearing to read "TSS", is written over the closing and name.

Todd S. Stewart
Counsel for the Retail Energy Supply Association
("RESA")

TSS/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

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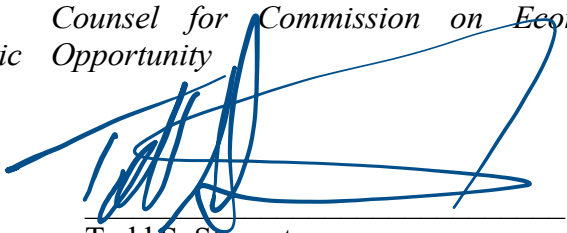
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DATED: August 18, 2026


Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of UGI Utilities, Inc. and	Docket Nos. A-2026-3063610
Argo Infrastructure Partners LLC for a	A-2026-3063612
Certificate of Public Convenience Under	A-2026-3063614
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.	

**AMENDED PETITION TO INTERVENE
OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

NOW COMES, The Retail Energy Supply Association (“RESA”), and hereby amends its Petition to Intervene initially filed with the Pennsylvania Public Utility Commission (“Commission”) and the Honorable Presiding Administrative Law Judge on August 14, 2026, pursuant to 52 Pa. Code §5.71. *et. seq.* The purpose of this Amendment is to expand the Petition to address the tardiness of the initial petition and to supply additional facts that were not known at the time the initial Petition was filed. RESA hereby acknowledges that its Petition was late filed

and asks that its late filed petition be granted, nonetheless. As a trade organization, it sometimes takes more time than is allotted for the members respond to an issue in sufficient numbers to make an intervention possible. Such was the case here. RESA notes that the Prehearing Conference in this matter has been scheduled for September 18, 2026, and that its late intervention is not likely to prejudice any party.

RESA has unique interests that cannot be represented by any other party. As discussed more fully below, RESA is a trade association comprised of competitive energy suppliers, including electric generation suppliers (“EGS”) serving customers on the UGI Utilities, Inc.- Electric Division (“UGI-Electric”) system and natural gas suppliers (“NGS”) that are currently providing natural gas supply service using the jurisdictional facilities of UGI Utilities, Inc. – Gas Division (“UGI GAS”). RESA represents the interests of those energy suppliers in proceedings before the Commission.¹ In support of their Petition to Intervene, RESA states and avers as follows:

1. On or about June 24, 2026, UGI filed with the Commission a request for the following approvals: (i) 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 Electric 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 by UGI Utilities, Inc. (“Joint Application”).

2. RESA is represented in the above-captioned matter by the following counsel:

Todd S. Stewart, Attorney I.D. No. 75556
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3. RESA represents its own interests as an industry trade association, which includes the interests of its EGS members that serve customers on the UGI-Electric system and Natural Gas Supplier members that currently serve customers across the full spectrum of customer classes on the UGI-Gas system, including residential, commercial, and industrial customers. As such, RESA and its members have a direct and immediate interest in any modifications to any tariff, rule changes, process changes or the like, which could impact their ability to serve their customers, both electric and gas, and they have a clear interest in any tariff provisions, whether new or existing, that directly have impacted or will impact their ability to reasonably and fairly serve customers on the UGI-Electric and UGI-Gas systems. As a trade association that represents the interests of competitive suppliers, RESA has standing to participate in this matter.

4. RESA has concerns related to ensuring that the proposed changes do not negatively impact the operational requirements or competitiveness for suppliers on both the UGI-Electric system and the UGI-Gas system. This is especially true in a change of control situation which involves a re-organization of management and where issues involving affiliate relationships and other arrangements need to be examined.¹ RESA also is concerned generally with any changes in the UGI-Electric service territory that impact the ability of EGSs to compete due to re-arrangement

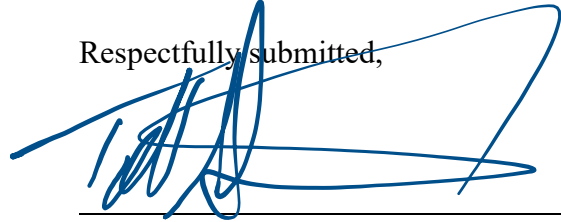
¹ The testimony attached to the filing notes that ARGO owns and operates a number of utilities in Pennsylvania.

of default service cost responsibility. Lastly, RESA seeks to ensure UGI's timely compliance with certain programs to which it agreed in the settlement of its UGI-Gas 2026 rate case.

5. The Commission's regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having an "interest which may be directly affected, and which is not adequately represented by existing participants and as to which the petitioner may be bound by the action of the Commission in the proceeding." RESA's members serve customers on the UGI-Electric system and will be immediately impacted by any changes to the requirements for operating on that system. Likewise, RESA's members on the UGI-Gas system, which means they all have an interest that will be directly affected by the outcome of this matter, their interests are not represented nor can they be adequately represented by any other party to this proceeding, and they will be bound by any action of the Commission in this proceeding. Because RESA is a trade association that has participated in innumerable Commission proceedings as a trade association comprised of participants in competitive markets its participation is in the public interest. Accordingly, RESA's Petition to Intervene should be granted.

WHEREFORE, RESA respectfully requests that the Presiding Administrative Law Judge and Commission grant their Petition to Intervene in the above-captioned matter and provide them with full party status in this proceeding.

Respectfully submitted,



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*Counsel for The Retail Energy Supply
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DATED: August 18, 2026