



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

September 17, 2026

Via Electronic Filing

Matthew L. Homsher, 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
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Carrie B. Wright'.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/ac
Enclosures

cc: Administrative Law Judge F. Joseph Brady (via email – fbrady@pa.gov)
Pamela McNeal, Legal Assistant (via email – pmcneal@pa.gov)
Per 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 Nos. A-2026-3063610
operate the assets of UGI Utilities, LLC –	:	A-2026-3063612
Electric Division and provide retail electric	:	A-2026-3063614
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.	:	

**PREHEARING MEMORANDUM OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

TO ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:

In accordance with the Prehearing Conference Order dated September 9, 2026, the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) hereby submits this Prehearing Memorandum in the above-captioned docket. The I&E prosecutors assigned to this proceeding are Carrie B. Wright, Adam J. Williams, and Joanna Toft-Funk. The I&E prosecutors may be contacted as follows:

By mail: Carrie B. Wright
Adam J. Williams
Joanna Toft-Funk
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(717) 787-8745 (AJW)
(717) 783-6184 (JTF)

I. BACKGROUND

On June 25, 2026, UGI Utilities, Inc. (“UGI”) and Argo Infrastructure Partners, LLC (“Argo”) filed a Joint Application for a Certificate of Public Convenience (“CPC”) 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. (Joint Application).

A Telephonic Prehearing Conference is scheduled for Friday, September 18, 2026, at 10:00 a.m., before Administrative Law Judge F. Joseph Brady (“ALJ Brady”). I&E submits this Memorandum in compliance with the Prehearing Conference Order issued by ALJ Brady.

II. ISSUES

The following list represents I&E's preliminary determination of the potential issues in this proceeding:

- Terms of the Transition Service Agreement
- Post Transition Conditions of the Proposed Acquisition
- Conflicts of Interest Related to Investments
- Data Centers
- Compliance with prior Commission Orders and Settlements
- Safety Record and Safety Training Programs
- Peoples' Safety Training Program
- Any Other Issues Related to Electric Safety.

The list is as complete as can be made at this time. I&E reserves the right to address other issues, as it deems appropriate if any such relevant issues arise.

III. WITNESSES

It is currently expected that I&E may call the following witnesses without being limited thereto:

- Ethan Cline, Fixed Utility Supervisor
- Zachari Walker, Fixed Utility Financial Analyst
- Benedict Tarr, Electric Safety Engineer

The I&E witnesses may be contacted through the contact information listed above for the I&E Prosecutors. I&E reserves the right to substitute witnesses or call additional witnesses if warranted.¹ All active parties will be notified of any amendments to the I&E witness list.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Joint Application, answers to data requests and interrogatories, annual reports and other documents

¹ The above issues list is provided without analysis of the positions of all parties to this proceeding and without the benefit of completed discovery.

submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports. However, there may be issues of Commission policy or legal representation that are not properly the subject of testimony or factual issues that are clear on the record and need not be supported by testimony, I&E reserves the right to dispense with testimony when, in its opinion, an issue can be adequately addressed through briefing.

V. DISCOVERY

I&E is not proposing discovery modifications in this proceeding. However, I&E does not object to shortening the time frame for responding to interrogatories. I&E will review any discovery modifications proposed by the other parties.

VI. SCHEDULE

I&E will work with the parties to develop a schedule in this proceeding.

As hearings in this proceeding will likely require the involvement of various Commission employees from I&E, most of which are based out of the Commission's Harrisburg office, I&E respectfully requests that hearings be held in Harrisburg.

VII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E will accept and prefers electronic delivery of documents without the need to follow up with hard copies.

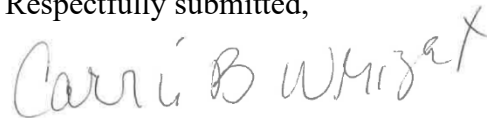
VIII. PUBLIC INPUT HEARINGS

To the extent that Public Input hearings are held in this proceeding, I&E request that they be held telephonically to the extent possible. I&E makes this request as participation in Public Input Hearings in UGI Electric's recently filed base rate case was limited.

IX. SETTLEMENT

I&E intends to participate in any settlement discussions and is willing to work with the parties to reach a resolution of any or all issues. In the event settlement discussions fail to result in a complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carrie B. Wright".

Carrie B. Wright
Deputy Chief Prosecutor
PA Attorney ID No. 208185

Adam J. Williams
Prosecutor
PA Attorney ID No. 310019

Joanna Toft-Funk
Prosecutor
PA Attorney ID No. 84476

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

September 17, 2026

**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	:	Docket Nos. A-2026-3063610
Own and Operate the Assets of UGI Utilities,	:	A-2026-3063612
LLC – Electric Division and Provide Retail	:	A-2026-3063614
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.	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated
September 17, 2026, in the manner and upon the persons listed below.

Served via Electronic Mail Only

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