

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

@pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

September 17, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
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

Dear Secretary Homsher:

Enclosed please find the Office of Consumer Advocate's Prehearing Memorandum in this matter.

Respectfully submitted,

/s/ Crystal M. Zook
Crystal M. Zook, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334159
Email: CZook@paoca.org

Secretary Homsher
September 17, 2026
Page 2

Enclosures

cc: The Honorable F Joseph Brady (email only via legal assistant Pamela McNeal:
pmcneal@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

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	:	Docket Nos. A-2026-3063610
a New Entity to Own and Operate the	:	A-2026-3063612
Assets of UGI Utilities, LLC – Electric	:	A-2026-3063614
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.	:	

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Prehearing Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 17th day of September, 2026.

SERVICE BY E-MAIL ONLY

Steven C. Gray, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov
Counsel for OSBA

Jessica Rogers
UGI Utilities, Inc.
1 UGI Drive
Denver, PA 17517
rogersj@ugi.com
Counsel for UGI

Carrie B. Wright, Esq.
Adam J. Williams
Joanna Toft-Funk
Bureau of Investigation and Enforcement
Commonwealth Keystone Building,
400 North Street
Harrisburg, PA 17120
carwright@pa.gov
adawilliam@pa.gov
jtoftfunk@pa.gov
Counsel for I&E

Michael Swerling, Esq
UGI Utilities, Inc.
500 North Gulph Road
King of Prussia, PA 19406
swerlingm@ugicorp.com
Counsel for UGI

Todd S. Stewart, Esq.
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
tsstewart@hmslegal.com
Counsel for RESA

David MacGregor, Esq.
Garrett P. Lent, Esq.
Lindsay A. Berkstresser, Esq.
Post & Schell
17th North 2nd Street, 12th Floor
Harrisburg, PA 17101
dmacgregor@postschell.com
glent@postschell.com
lberkstresser@postschell.com
Counsel for UGI

Devin T. Ryan, Esq.
Emily S. Grecu, Esq.
Post & Schell
One Oxford Center
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com
egrecu@postschell.com
Counsel for UGI

Alan M. Seltzer, Esq.
John F. Povilaitis, Esq.
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com
Counsel for Argo Infrastructure Partners

Joseph L. Vullo, Esq
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for CEO

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Dated: September 17, 2026

/s/ Crystal M. Zook
Crystal M. Zook, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334159
Email: CZook@paoca.org

Christy Appleby, Esq.
Senior Assistant Consumer Advocate
Jacob D. Guthrie, Esq.
Johnathan M. Longhurst, Esq.
Katie M. Kennedy, Esq.
Assistant Consumer Advocates
E-Mail: OCAArgoUGI26@paoca.org

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	:	Docket Nos. A-2026-3063610
a New Entity to Own and Operate the	:	A-2026-3063612
Assets of UGI Utilities, LLC – Electric	:	A-2026-3063614
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.	:	

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Orders issued on August 14, 2026 and September 9, 2026, in the above-captioned proceeding, by the Administrative Law Judge (ALJ) F. Joseph Brady of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333, the Commission's regulations at 52 Pa. Code Sections 5.221-5.224, the

Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION AND PROCEDURAL HISTORY

On June 24, 2026, UGI Utilities, Inc. (UGI) and Argo Infrastructure Partners, LLC (Argo) (collectively, the Joint Applicants) filed a Joint Application seeking approval of the Commission under Chapters 11 and 28 of the Public Utility Code: (I) For the Conversion of UGI 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; and (V) for the Cessation and Abandonment of any and all Retail Electric Service in Pennsylvania for UGI.

UGI provides electric distribution service to approximately 63,000 residential, commercial, and industrial customers in portions of Luzerne and Wyoming Counties. Under the Joint Application, UGI would be allowed to create a new entity, Wyoming Valley Electric LLC (Wyoming Valley or Company), transfer ownership and operation of its electric utility operations to Wyoming Valley, transfer all its interests in Wyoming Valley to a newly formed Argo-controlled entity, and allow UGI to cease and abandon the ownership and operation of the utility assets and retail electric service it provides to its Electric Division customers in Luzerne and Wyoming Counties, Pennsylvania.

On July 9, 2026, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance in the dockets.

On July 27, 2026, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding to protect the interests of consumers in the UGI's service territory and to ensure that the Joint Application only be granted upon findings that the granting of such Application is necessary or proper for the service, accommodation, convenience or safety of the public.

The Commission on Economic Opportunity (CEO) filed a Petition to Intervene on July 24, 2026.

The Bureau of Investigation and Enforcement (I&E) filed a Notice of Appearance on July 29, 2026.

On August 14, 2026, the Retail Energy Supply Association filed a petition to intervene and an Amended Petition to Intervene on August 18, 2026 in the proceeding.

II. ISSUES

Based upon a preliminary analysis of the Company's Application for the above-referenced matter(s), the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate request. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. Whether the Application is necessary or proper for the service, accommodation, convenience, or safety of the public.

1. The OCA will examine all issues relating to Merger and Acquisition questions raised by the Application.

2. The OCA will examine the Corporate Finances of UGI Electric and Argo in light of this Application.

3. The OCA will examine any regulatory policy issues that arise from the Application.
4. The OCA will examine any accounting issues that arise from the Application.
5. The OCA will examine the affiliate transaction issues that arise from the Application, specifically the lack of any plan to establish a service company or similar mechanism that would create cost savings, cost sharing, and economies of scale.
6. The OCA will examine any cost-allocation issues that arise from the Application, including any cost-of-service implications if the Application is approved.
7. The OCA will examine any financial risk issues that arise from the Application
8. The OCA will examine any capital structure issues that arise from the Application
9. The OCA will examine any credit analysis issues that arise from the Application.
10. The OCA will examine any competition issues that arise from the Application.
11. The OCA will examine any market impact issues that arise from the Application.
12. The OCA will examine whether ring-fencing measures are appropriate and will propose any that the OCA deems necessary protections.
13. The OCA will examine the details of the payments described as “Data Center Payments” and the impact on the successor company to UGI Electric.
14. The OCA will examine whether the proposed transaction adheres to the Substantial Affirmative Public Benefits standards and the Penn Estates public interest considerations.

B. Low-Income Programs

1. The OCA will analyze how the acquired Company will address affordability issues in general.
2. The OCA will analyze how the acquisition will “affirmatively promote the service, accommodation, convenience, or safety of the public in some substantial way” as it relates to affordability and universal service.
3. The OCA will examine how the acquired Company intends to manage and mitigate risks associated with unaffordability.
4. The OCA will examine whether the acquired Company intends to continue UGI-Electric’s existing Universal Service Program, and whether the statement by Joint Applicants that the Acquisition would have no adverse impact on rates and service is a commitment to maintain the existing UGI-Electric Universal Service Program.
5. The OCA will review other issues that may arise related to Universal Service Program questions.

6. The OCA will review the technical fitness of the Acquiring Company to continue UGI Electric's existing Universal Service Program.

C. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.

2. The OCA will examine whether there will be any foreseeable impact to the quality of service through this proposed Acquisition and whether any conditions must be imposed to protect against any deterioration of the current quality of service.

D. Customer Service

1. The OCA will review the Company's consumer protection policies and programs in order to ensure compliance with Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations.

2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.

3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.

4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.

5. The OCA will examine any impact the Acquisition would have on current customer service, particularly once the Transition Service Agreement ends and any dedicated staff would move to the acquired Company, in light of the fact that many customer service supports are currently enmeshed with UGI Gas customer service.

6. The OCA will examine the Company's response to the most recent Commission Management Audit.

7. The OCA will examine whether any conditions must be imposed to protect against any deterioration of the current levels of customer service.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories,

testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Merger and Acquisition/ Corporate Finance /
Regulatory Policy / Accounting / Affiliate
Transactions / Cost Allocation / Financial Risk /
Capital Structure / Credit Analysis /
Competition / Market Impact

Serhan Ogur
Lafayette Morgan
Exeter Associates, Inc.
10480 Little Paxtuxent Parkway
Suite 300
Columbia, Maryland 21044
OCAArgoUGI26@paoca.org

Affordability of Service / Universal Service
Programs

Roger Colton
Fisher, Sheehan, and Colton
34 Warwick Road
Belmont, MA 02478-2841
OCAArgoUGI26@paoca.org

Customer Service / Quality of Service

Barbara A. Alexander
Barbara Alexander Consulting LLC
44 Beech St.
Hallowell, ME 04347
OCAArgoUGI26@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. PROPOSED SCHEDULE

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

Public Input Hearings	Week of October 21st 2026
Other Parties' Direct Testimony	Thursday, November 12, 2026
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	May be needed depending on timing of public input hearings and other party direct testimony
Rebuttal Testimony (all parties and all issues)	Friday, December 30, 2026
Surrebuttal Testimony (all parties and all issues)	Friday, January 15, 2027
Written Rejoinder	Tuesday, January 19, 2027 (by 4:00 pm)
Evidentiary Hearings	January 26 and 27 (if necessary), 2027
Main Briefs	Friday, February 19, 2027
Reply Briefs	Friday, March 5, 2027

The OCA requests that the dates included in any litigation schedule in this matter be considered "in-hand" dates and that electronic service on the due date will satisfy the "in-hand" requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below.

Christy M. Appleby, Senior Assistant Consumer Advocate
Jacob D. Guthrie, Assistant Consumer Advocate

Katherine “Katie” Kennedy, Assistant Consumer Advocate
Johnathan M. Longhurst, Assistant Consumer Advocate
Crystal M. Zook, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCAArgoUGI26@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA’s group email address will provide the emailed materials to all members of the OCA team including the consultants listed above.

The OCA also requests that the ALJ instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

For the purposes of the Prehearing Conference, Christy Appleby will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission’s procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference, September 18, 2026. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the

Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:00 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After Direct Testimony is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party

in writing within three (3) calendar days of service of the interrogatories and/or requests for production.

- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:00 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

At the Prehearing Conference, the OCA requests an on-the-record discussion regarding font size requirements and page limitations for briefing.

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.

B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully

requests that four public input hearings be held, two in-person and two telephonic, for the Company's customer base impacted by this rate filing.

Attached as **Appendix A** is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJ).

The OCA specifically requests the following for public input hearings:

A. Given the size of the customer base and service territory, a total of four (4) Public Input Hearings be held, two in-person and two telephonic.

B. The in-person public input hearings include a combination of daytime and evening hearings at a location with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits, such as cross examination exhibits and a list of evidence to be moved into the record (i.e., a party's list of pre-served testimony and exhibits), be required to be submitted to the ALJ by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

I. In addition to the Company publishing the notice in a newspaper of general circulation for its service territories, the OCA respectfully requests that the Company post notice of the public input hearings on all of their social media platforms at least twice per week during each week prior to the scheduled dates of the public input hearings.

J. The Company be directed to send notice of the public input hearings via a bill insert during a billing cycle to occur shortly after this prehearing conference and prior to the scheduled dates of the public input hearings.

X. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position section following the Summary of Argument section. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 81617
CAppleby@paoca.org

Jacob D. Guthrie, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334367
JGuthrie@paoca.org

Katherine “Katie” Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
KKennedy@paoca.org

Johnathan M. Longhurst
Assistant Consumer Advocate
PA Attorney I.D. # 338157
JLonghurst@paoca.org

Crystal M. Zook
Assistant Consumer Advocate
PA Attorney I.D. # 334159
CZook@paoca.org
OCAArgoUGI26@paoca.org

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

DATED: September 17, 2026

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For the 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

A-2026-3063614

The Pennsylvania Public Utility Commission (PUC) will conduct [#] Public Input Hearings concerning the Joint Application filed by UGI Utilities, Inc. and Argo Infrastructure Partners LLC on June 24, 2026, seeking to (1) convert UGI Utilities, Inc to an LLC; (2) divide UGI's assets; (3) form a new entity to own and operate UGI-Electric's Assets; (4) sell the new entity to Argo Infrastructure Partners; and (5) for UGI-Electric to cease and abandon retail electric service in Pennsylvania. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officer: Administrative Law Judge F. Joseph Brady

IN-PERSON PUBLIC INPUT HEARINGS

Pre-registration is not required.

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS
Pre-registration is [encouraged/required]. Read below.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
 - Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I.** Introduction
- II.** Legal Standards
- III.** Summary of Argument
- IV.** Argument
 - A.** Overall Position on Acquisition
 - B.** Conditions Proposed by the Parties
- V.** Conclusion

Appendix A: Proposed Findings of Fact

Appendix B: Proposed Conclusions of Law

Appendix C: Proposed Ordering Paragraphs

Note: Appropriate modifications may be made. Additional subheadings should be used, as appropriate.