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File #: 193132

April 26, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PA PUC v. Columbia Gas of Pennsylvania, Inc.
Docket Nos. R-2022-3031211, et al.
Columbia Gas of Pennsylvania, Inc.
Supplement No. 343 Proposed Tariff Modifications for
Inclusion of the Green Path Rider
Docket No.**

Dear Secretary Chiavetta:

Attached is the Motion to Consolidate the Proposed Tariff Modifications for Inclusion of the Green Path Rider with the Base Rate Case at Docket No. R-2022-3031211, filed on behalf of Columbia Gas of Pennsylvania, Inc., in the above-referenced proceedings. Copies will be provided per the attached Certificate of Service.

Respectfully submitted,



Lindsay A. Berkstresser

Rosemary Chiavetta, Secretary
April 26, 2022
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LAB/kl
Attachment

cc: Honorable Christopher P. Pell (*w/att.*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

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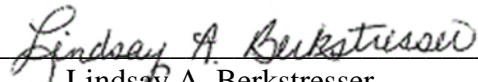
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Date: April 26, 2022



Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031211
	:	
Columbia Gas of Pennsylvania, Inc.	:	

Columbia Gas of Pennsylvania, Inc.	:	
Tariff Supplement No. 343	:	
Proposed Tariff Modifications for	:	Docket No. _____
Inclusion of the Green Path Rider	:	
	:	

**MOTION TO CONSOLIDATE COLUMBIA GAS OF PENNSYLVANIA INC.’S
PROPOSED TARIFF MODIFICATIONS FOR INCLUSION OF THE GREEN PATH
RIDER WITH THE BASE RATE CASE FILED PURSUANT TO 66 Pa. C.S. § 1308 AT
DOCKET NO. R-2022-3031211**

TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE PELL:

Pursuant to 52 Pa. Code §§ 5.103 and 5.81, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”), by and through its attorneys, Post & Schell, P.C., hereby files this Motion to Consolidate the Company’s Proposed Tariff Modifications for Inclusion of the Green Path Rider (“Green Path Rider tariff filing”) with the base rate increase filed at Docket No. R-2022-3031211 (“base rate proceeding”). In support of its Motion, Columbia states as follows:

I. BACKGROUND

On March 18, 2022, Columbia filed its Supplement No. 337 to Tariff Gas Pa PUC No. 9, seeking an increase of approximately \$82.2 million in base rates, based upon a Fully Projected Future Test Year ending December 31, 2023.

The Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania State University, Constance Wile, and Jose Serranno filed formal complaints. The Pennsylvania Weatherization Providers Task Force, Inc., the Retail Energy Supply Association, Shipley Choice, LLC, and NRG Energy, Inc., and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania filed petitions to intervene. The Commission's Bureau of Investigation and Enforcement filed a notice of appearance.

On April 14, 2022, the Commission suspended Columbia's proposed rate increase until December 17, 2022, and referred the rate filing to the Office of Administrative Law Judge for hearings and a recommended decision.

On April 26, 2022, Columbia filed Tariff Supplement No. 343 to Tariff Gas Pa PUC No. 9, which proposes to add the Green Path Rider to Columbia's tariff. The Green Path Rider is a 5-year pilot program that would provide customers with an option to reduce 100% or 50% of the emissions related to their natural gas usage. To do this, Columbia proposes to purchase renewable natural gas ("RNG") environmental attributes and carbon offsets to reduce the customer's emissions associated with their natural gas usage. The RNG environmental attributes and carbon offsets will be purchased to match the customer's election of either a 100% reduction in emissions or a 50% reduction. Customers opting into the Green Path Rider will be charged an additional fee per therm that reflects the cost of the RNG environmental attributes and carbon offsets. The Green Path Rider would be entirely voluntary.

II. CONSOLIDATION OF THE GREEN PATH RIDER TARIFF FILING WITH THE BASE RATE PROCEEDING IS APPROPRIATE

The Commission's regulations at 52 Pa. Code § 5.81 provide for the consolidation of proceedings. Section 5.81 provides:

(a) The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

(b) Subsection (a) is identical to 1 Pa. Code § § 35.45 and 35.122 (relating to consolidation; and consolidation of formal proceedings).

Consolidation will allow all issues related to the Green Path Rider tariff filing to be addressed in the context of the base rate proceeding. It is appropriate to consider the Green Path Rider as part of the overall rate increase requested in the base rate proceeding because the Green Path Rider will impact the bills of those customers who voluntarily elect the Green Path Rider by adding an additional line item to the bill. In this regard, the Green Path Rider is related to the issues to be examined in a base rate proceeding. Consolidation will facilitate the parties' and the Commission's ability to review the Green Path Rider tariff filing along with the other proposals in Columbia's rate case.

Additionally, consolidation of the Green Path Rider tariff filing with the base rate proceeding is appropriate because deciding both the Green Path Rider and the Columbia's proposed rate increase in a single proceeding is the most efficient use of administrative resources, as well as the parties' resources. Columbia anticipates that many of the parties who have intervened in or filed a complaint against the base rate proceeding will have an interest in examining the Green Path Rider. To date, no procedural schedule has been established for the base rate proceeding and no prehearing conference has occurred in that case. Therefore, consolidation of the recently filed Green Path Rider with the base rate proceeding would not delay the outcome of either proceeding.

This Motion is being served on the parties to Columbia's base rate proceeding at Docket No. R-2022-3031211.

III. CONCLUSION

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that its Green Path Rider tariff filing be consolidated with the base rate proceeding at Docket No. R-2022-3031211.

Respectfully submitted,



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Date: April 26, 2022

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