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January 29, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
Harrisburg, PA 17120

In re: Joint Application of Pike County Light and Power Company, Corning Natural Gas Holding Corporation and Orange and Rockland Utilities, Inc. for: a Certificate or Certificates of Public Convenience Evidencing the Pennsylvania Public Utility Commission's Approval of: the Transfer by Sale of 100% of the Issued and Outstanding Stock of Pike County Light & Power Company, a Public Utility Providing Natural Gas and Electric Distribution Service in Pennsylvania, from Seller Orange and Rockland Utilities, Inc. to Buyer Corning Natural Gas Holding Corporation; Approval of Certain Affiliated Interest Filings and Security Certificates; and, All Other Approvals Or Certificates Appropriate, Customary or Necessary Under the Public Utility Code to Carry Out The Transactions Described in the Application; Docket No. A-2015-2517111; A-2015-2517036; G-2015-2517113; G-2015-2517114; S-2015-2517115 and S-2015-2517116;
CORNING NATURAL GAS HOLDING CORPORATION PREHEARING CONFERENCE MEMORANDUM

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Prehearing Conference Memorandum of Corning Natural Gas Holding Corporation in the above-captioned docket. Copies have been served in accordance with the attached Certificate of Service.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
January 29, 2016
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Should you have any questions or comments, please feel free to contact me directly..

Very truly yours,



Thomas J. Sniscak
William E. Lehman
Whitney E. Snyder

TJS/das
Enclosure

cc: ALJ Susan D. Colwell
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Joint Application of Pike County :
Light and Power Company, Corning :
Natural Gas Holding Corporation and :
Orange and Rockland Utilities, Inc. for: a :
Certificate or Certificates of Public :
Convenience Evidencing the Pennsylvania :
Public Utility Commission’s Approval of: :
the Transfer by Sale of 100% of the Issued :
and Outstanding Stock of Pike County : Docket Nos.: A-2015-2517111
Light & Power Company, a Public Utility : A-2015-2517036
Providing Natural Gas and Electric : G-2015-2517113
Distribution Service in Pennsylvania, from : G-2015-2517114
Seller Orange and Rockland Utilities, Inc. : S-2015-2517115
to Buyer Corning Natural Gas Holding : S-2015-2517116
Corporation; Approval of Certain :
Affiliated Interest Filings and Securities :
Certificates; and, All Other Approvals Or :
Certificates Appropriate, Customary or :
Necessary Under the Public Utility Code to :
Carry Out The Transactions Described in :
the Application.

**PREHEARING CONFERENCE MEMORANDUM OF
CORNING NATURAL GAS HOLDING CORPORATION**

TO THE HONORABLE SUSAN D. COLWELL:

On December 4, 2015, Pike County Light & Power Company (“PCL&P”) as a public utility, Buyer Corning Natural Gas Holding Corporation (“CNGHC”), and Seller Orange and Rockland Utilities, Inc. (“Orange and Rockland”) (collectively the “Joint Applicants”) filed an Application requesting all necessary authority, approvals and certificates of public convenience from the Pennsylvania Public Utility Commission (“Commission”), pursuant to Sections 1102(a)(3), 2102(b) and 1901(a) and (c) of the Public Utility Code, 66 Pa.C.S. §§1102(a)(3), 2102(b) and 1901(a) and (c), regarding: (1) the transfer of all of PCL&P affiliate Orange and

Rockland's ownership interests in PCL&P to CNGHC; (2) affiliated interest agreement(s); and (3) securities transactions involving PCL&P. The Joint Applicants, as applicable, also seek all other approvals and certificates appropriate, customary, or necessary under the Public Utility Code to carry out the transactions contemplated in the Application in a lawful manner.

On January 12, 2016 an E-serve Notice was issued by the Commission setting a Prehearing Conference in the above-captioned proceeding for Monday, February 1, 2016 before the Honorable Susan D. Colwell ("ALJ Colwell"). CNGHC, by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Conference Memorandum.

a. Acceptance of Service

Service of paper documents in this proceeding shall be accepted on behalf of CNGHC by:

Thomas J. Sniscak, Esq.
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Counsel for CHGHC also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak (tjsniscak@hmslegal.com), William E. Lehman (welehman@hmslegal.com), Christopher M. Arfaa (cmarfaa@hmslegal.com) and Whitney Snyder (wesnyder@hmslegal.com). CNGHC is willing to extend the same courtesy upon request of any other party for any e-mails or electronic service to the parties.

b. Settlement

At this time, no settlement discussions have taken place; however, in compliance with the Commission's regulations encouraging settlements, CNGHC will actively seek to participate in settlement discussions or to achieve stipulations in whole or in part with the other parties.

c. Discovery

CNGHC has already received discovery requests from OCA and will work with the parties to develop a final discovery schedule.

d. Other Proposed Discovery Orders

Corning proposes the following modifications to the Commission's normal discovery timelines.

Discovery Modifications:

- A. Answers to interrogatories shall be served in-hand within best efforts for seven (7) calendar days and no later than ten (10) calendar days unless otherwise agreed to by the parties. Discovery requests served after 12:00 p.m. on a Friday or the day before a Commission holiday shall be deemed served on the next business day.
- B. Objections to interrogatories to be communicated orally within three (3) calendar days of service; unresolved objections shall be served to the ALJ in writing within five (5) calendar days of service of interrogatories.
- C. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of such motions.
- E. Rulings over such motions shall be issued, if possible within seven (7) calendar days of the filing of the motion.
- F. Responses to requests for document production, entry for inspection, or other purposes to be served within best efforts in-hand within ten (10) calendar days.

- G. Requests for admission to be deemed admitted or denied unless answered within seven (7) calendar days or objected to within five (five) calendar days of service.
- H. Any Motion, Answer to Motions or Objection subject above to a three (3) day calendar filing or response period that commences to run due to service on a Friday shall be due the following Tuesday.

e. Service of Documents

CNGHC proposes that all due dates for any documents in this proceeding are in-hand the day they are due. Service of documents by email by 4:30 p.m on the due date will be considered in-hand if a hard copy is sent the same or next day by First Class US Mail unless a party waives service by hard copy for all or selected documents. Any pleading or discovery request served after noon on a Friday or the day before a Commission holiday shall be considered served the next business day.

f. Litigation Schedule

CNGHC proposes the following litigation schedule; however, CNGHC will work with the other parties before the Prehearing Conference to try to develop a schedule mutually-agreeable among the parties for Your Honor’s consideration. CNGHC requests that the hearings be held at the Commission’s offices in Harrisburg, Pa.

Joint Petitioners’ Testimony:	February 19, 2016
Protestants/Intervenors:	March 18, 2016
Settlement Conference:	March 23, 2016
Rebuttal:	April 4, 2016
Hearings in Harrisburg Pa:	April 12-14, 2016
Main Brief:	April 29, 2016
Reply Brief:	May 9, 2016

g. Witnesses

CNGHC's witnesses will be identified by the filing of its direct testimony on the agreed-upon date. CNGHC reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

h. Issues and Sub-Issues

CNGHC will address all issues relevant to whether the proposed tractions sufficiently benefit the public and meet the requirements of Chapter 11 of the Public Utility Code, 66 Pa.C.S §§1101 *et. seq.* CNGHC reserves the right to present additional witnesses, testimony and exhibits on any other issues that may arise during the course of this proceeding.

i. Evidence

CNGHC will submit pre-filed direct testimony and associated exhibits addressing the issues identified in the preceding above in accordance with the schedule set forth above or as otherwise directed by ALJ Colwell. CNGHC may introduce documents or evidence into the record in the course of cross-examination, re-direct examination, or as a result of any stipulation or settlement in whole or part.

WHEREFORE, the Corning Natural Gas Holding Corporation respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



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Attorneys for Corning Natural Gas Holding Corporation

Date: January 29, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct 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).

BY FIRST CLASS MAIL

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DATED: January 29, 2016