

Tanya C. Leshko
717 237 4868
tanya.leshko@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852

March 7, 2019

VIA E-FILING

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


Re: Pennsylvania Public Utility Commission v. Peoples Natural Gas Company LLC
Docket No. R-2018-3006818

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Petition to Intervene of Equitrans, L.P., in the above-captioned proceeding.

Copies have been served on all parties as indicated in the attached Certificate of Service.

Very truly yours,


Tanya C. Leshko

TCL/tlg
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2018-3006818
Peoples Natural Gas Company LLC	:	

PETITION TO INTERVENE OF EQUITRANS, L.P.

Pursuant to 52 Pa. Code §§ 5.71-5.75 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, Equitrans, L.P. (“Equitrans”) hereby files this Petition to Intervene (“Petition”) in the above captioned matter, and in support thereof states as follows:

I. INTRODUCTION

1. Equitrans is a limited partnership organizing and existing under the laws of the Commonwealth of Pennsylvania. Equitrans owns, operates, acquires and develops natural gas transmission, storage, and gathering assets as well as water services to support energy development and production in the Appalachian Basin, including western Pennsylvania.

2. Equitrans’ transmission and storage system includes approximately 950 miles of FERC-regulated interstate gas pipelines that connect to seven interstate gas pipelines and local distribution companies, including Peoples Natural Gas. The transmission and storage system is supported by 18 associated natural gas storage reservoirs with approximately 857 million cubic feet (“MMcf”) per day of maximum dependable withdrawal capacity and 41 Bcf of working gas capacity, 41 compressor units with compression of approximately 120,000 horsepower, and total throughput capacity of approximately 4.4 Bcf per day at year-end 2017. Equitrans’ gathering system includes approximately 1,500 miles of low-pressure gas gathering lines.

3. Equitrans’ principal place of business is:

625 Liberty Avenue
Suite 2000
Pittsburgh, PA 15222

Equitrans' attorneys in this matter are:

Tanya C. Leshko
Alan M. Seltzer
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357

Equitrans' attorneys are authorized to accept service on behalf of Equitrans. Equitrans requests that the Commission and all parties of record serve copies of all documents and Commission orders in the above-captioned proceedings upon Equitrans' attorneys.

4. On January 28, 2019, Peoples Natural Gas and Peoples Gas Company LLC ("Peoples Gas") filed its 2019 "Base Rate Filing" ("Filing") consisting of (i) Retail Tariff Gas – PA PUC No. 47, Supplier Tariff Gas – PA PUC No. S-3, responses to the Commission base rate filing requirements and standard data requests, and supporting direct testimony and exhibits. Among other things, Peoples proposes to combine the supplier tariff provisions of its Peoples and Equitable Divisions. If the entire relief sought in the Filing is approved, the total bill for a Peoples Division residential customer using 86 Mcf per year would increase from \$74.24 to \$84.73 per month or by 14.1%. The proposed increase for a commercial customer using 238 Mcf per year would increase under the Filing from \$150.79 to \$172.56 per month of by 14.4%. The proposed increase reflected in the Filing would impact the rates charged to Equitrans to its facilities, as noted further below.

5. The proposed increase in the Filing constitutes a general rate increase according to Section 1308(d) of the Public Utility Code. 66 Pa. C.S. § 1308(d). Review of the Tariff filed by Peoples indicates that the rates proposed therein may be unjust, unreasonable and inconsistent with the Public Utility Code, sound ratemaking principles and public policy. In addition, the

proposed rate design may be discriminatory, unjust and unreasonable, and violative of ratemaking principles.

6. Specifically, Equitrans is a commercial customer of Peoples for a number of Equitrans' facilities, including, but not limited to, the following:

- a. Waynesburg Furman, 317 East Roy Furman Hwy, Waynesburg, PA 15370-8078
- b. Tepe, 2461 Ridge Road, Finleyville, PA 15332
- c. Training Center, 4029 Ridge Road, Jefferson Hills, PA 15025-3515

7. As noted further below, Equitrans has a substantial and material interest in the outcome of this proceeding and needs to protect that interest by intervening in the Complaint Proceeding as described further below.

II. ELIGIBILITY TO INTERVENE

8. A person or entity's eligibility to intervene in proceedings before this Commission is governed by the Commission's regulations at 52 Pa. Code § 5.72. A proposed intervenor must demonstrate that it has a right to intervene or has an interest of such nature that intervention is necessary or appropriate to the proceeding. The requisite "right or interest" may be established by one of the following:

1. A right conferred by statute of the United States or the Commonwealth.
2. 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.
3. Another interest of such nature that participation of the petitioner may be in the public interest.

52 Pa. Code § 5.72.

9. As discussed further below, Equitrans has a direct interest in this proceeding that is not adequately represented by any other party.

III. EQUITRANS SATISFIES THE CRITERIA FOR INTERVENTION

10. Equitrans satisfies the criteria for intervention set forth in 52 Pa. Code §5.72(a)(2). As a current Peoples’ customer, Equitrans is concerned that it continues to receive safe, adequate and reasonable service from Peoples at reasonable rates in accordance with applicable Pennsylvania law including, without limitation, the provisions of the Public Utility Code, 66 Pa. C.S. § 101 *et seq.*

11. In addition, Peoples is a current customer of Equitrans under long-term transmission and storage service agreements with primary terms expiring in 2034. Equitrans delivers substantial volumes of natural gas directly into the Peoples’ distribution system for ultimate delivery to Peoples’ retail consumers, including Equitrans. Equitrans has a substantial and direct interest in understanding whether and to what extent the Filing will impact one of Equitrans’ largest customers or the long-term service agreements between Equitrans and Peoples.

12. Equitrans is also interested in assessing and monitoring the pipeline facilities between Equitrans and Peoples, and whether the relief sought in the Filing will impact these facilities, either positively or negatively.

13. Therefore, Equitrans has a direct and substantial interest in this proceeding that cannot adequately be represented by the existing parties.

IV. CONCLUSION

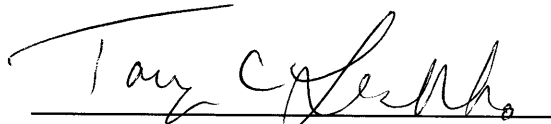
14. Equitrans is prepared to participate in this proceeding in a manner that is consistent with the need to protect its interests as both a customer of and contract counterparty with Peoples and in a manner that does not unduly interfere with the prompt adjudication of the

proceeding. No party will be prejudiced by Equitrans' intervention in this proceeding, and this intervention is meritorious because of Equitrans' substantial, direct and material interest in the outcome of the issues described above.

15. Accordingly, for the reasons specified above, Equitrans requests that this Petition be granted.

WHEREFORE, Equitrans, L.P. respectfully requests that the Commission grant this Petition to Intervene and such other relief as may be just and reasonable under the circumstances.

Respectfully submitted,



Tanya C. Leshko, Esquire
Alan M. Seltzer, Esquire
BUCHANAN INGERSOLL & ROONEY PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101-1357
(717) 237-4800

Dated: March 7, 2019

Attorneys for Equitrans, L.P.

VERIFICATION

I, John M. Quinn, do hereby verify that the averments contained in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I am authorized to sign this verification. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn declarations made to authorities.

Dated: March 6, 2019

A handwritten signature in cursive script, appearing to read "John M. Quinn", is written over a horizontal line.

John M. Quinn
Vice President, Rates

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2018-3006818
Peoples Natural Gas Company LLC	:	

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and First Class Mail:

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Devin T. Ryan, Esquire
Post & Schell, P.C.
17 North Second Street,
12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
dryan@postschell.com

Counsel for Peoples Natural Gas Company LLC

William H. Roberts II, Esquire
Peoples Natural Gas Company LLC
375 North Shore Drive
Suite 600
Pittsburgh, PA 15212
william.h.roberts@peoples-gas.com

Erin K. Fure, Esquire
Assistant Small Business Advocate
PA Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
efure@pa.gov

Erika L. McLain, Esquire
Carrie B. Wright, Esquire
PA Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ermclain@pa.gov
carwright@pa.gov

Christy M. Appleby, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
cappleby@paoca.org

Scott J. Rubin, Esquire
Law Office of Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com
*Counsel for Utility Workers Union of America,
Local 612*

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrelaw.com
*Community Action Association of
Pennsylvania*

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
*Counsel for Natural Gas Supplier Parties and
The Retail Energy Supply Association*

Linda R. Evers, Esquire
Donald R. Wagner, Esquire
Michael A. Gruin, Esquire
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
lr@stevenslee.com
drw@stevenslee.com
mag@stevenslee.com
Counsel for Duquesne Light Company

Kevin J. Moody, Esquire
PA Independent Oil & Gas Association
212 Locust Street
Suite 300
Harrisburg, PA 17101-1510
kevin@pioga.org

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
*Consultant for Office of Small Business
Advocate*

Via First Class Mail:

Daniel Killmeyer
184 McKay Road
Saxonburg, PA 16056

Charles F. Hagins
420 Goucher Street
Johnstown, PA 15905

Patrick M. Cicero, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Kadeem G. Morris Esquire
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Emily M. Farah, Esquire
Tishekia Williams, Esquire
Michael Zimmerman, Esquire
Duquesne Light Company
411 7th Avenue, 15th Floor
Pittsburgh, PA 16219
efarah@duqlight.com
twilliams@duqlight.com
tzimmerman@duqlight.com

Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
Erin T. McCaulley, Jr., Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
ppolacek@mcneeslaw.com
vkandrikas@mcneeslaw.com
emccaulley@mcneeslaw.com
*Counsel for Snyder Brothers, Inc., VEC Energy
LLC, and Snyder Armclar Gas Co., LP*

Sean D. Ferris
406 Laurie Drive
Penn Hills, PA 15235

Samuel Givens
132 Thunderbird Drive
McKeespo11, PA 15135

Date: March 7, 2019



Tanya C. Leshko