

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA’S
PRE-HEARING CONFERENCE MEMORANDUM**

I. HISTORY

The Community Action Association of Pennsylvania (CAAP) intervened in this matter by Petition to Intervene filed with the PUC on February 15, 2019. CAAP is a statewide association representing Pennsylvania’s community action agencies that provide anti-poverty planning and community development activities for low-income communities and services to individuals and families. CAAP has intervened in prior matters before the Pennsylvania Public Utility Commission for the purpose of addressing a company’s universal service programs and the effects of any requested rate increases, and rate design on low-income customers. CAAP intervened in this particular matter to examine the effect of the proposed rate increase and rate structure on low-income customers and to address whether the Company’s universal service programs are appropriately funded and available.

II. ISSUES TO BE PRESENTED BY CAAP

1. Whether the Company’s universal service programs are appropriately funded and available and whether those programs will remain appropriately funded and available if the request for a rate increase is granted.

2. The effect of any proposed rate increase or rate structure on the residential customer class and particularly low-income, residential customers.

3. Such other additional issues as may arise during the discovery process.


III. WITNESSES

CAAP will present the testimony of Susan Moore, Executive Director of CAAP. CAAP reserves the right to supplement this list of witnesses.

IV. PROPOSED SCHEDULE

Absent conflicts that CAAP's witness or counsel may have, CAAP will defer to the Company and statutory parties regarding a proposed schedule.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com
Attorney for Community Action Association
of Pennsylvania

Thomas J. Sniscak, Esquire
Hawke, McKeon & Sniscak, LLP
100 North 10th Street
Harrisburg, PA 17101

Theodore J. Gallagher, Esquire
NiSource Corporate Services Company
Energy Distribution Group Legal
121 Campion Way
Suite 100
Canonsburg, PA 15317

Donald R. Wagner, Esquire
Michael A. Gruin, Esquire
Stevens & Lee
111 North Sixth Street
Reading, PA 19601

Patrick M. Cicero, Esquire
John W. Sweet, Esquire
Elizabeth R. Marx, Esquire
Kadeem G. Morris, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street
Suite 300
Harrisburg, PA 17101

Via First Class Mail Only:

Michael J. Healey, Esquire
Healey, Bock & Hornack, P.C.
247 Fort Pitt Boulevard
4th Floor
Pittsburgh, PA 15222

Robert J. DeGregory
United Steelworkers
Five Gateway Center
Pittsburgh, PA 15222

Severo C. Miglioretti
115 Shearer Road
New Kensington, PA 15068

EQT Energy LLC d/b/a Equitable Energy
EQT Plaza
625 Liberty Avenue
Suite 1700
Pittsburgh, PA 15222

Daniel Killmeyer
184 McKay Road
Saxonburg, PA 16056

Charles F. Hagins
420 Goucher Street
Johnstown, PA 15905

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

Samuel Givens
132 Thunderbird Drive
McKeesport, PA 15135

JOSEPH L. VULLO, ESQUIRE

I.D. No. 41279

1460 Wyoming Avenue

Forty Fort, PA 18704

(570) 288-6441

e-mail: jlullo@bvrrlaw.com

Attorney for Community Action Association
of Pennsylvania