

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | R-2018-3006818 |
| | : | |
| Peoples Natural Gas Company LLC | : | |

**PREHEARING CONFERENCE MEMORANDUM
OF THE
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

To the Honorable Joel H. Cheskis, Deputy Chief Administrative Law Judge:

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and Your Honor's Prehearing Conference Order dated March 4, 2019, the Pennsylvania Independent Oil & Gas Association (PIOGA) submits this prehearing conference memorandum.

BRIEF HISTORY OF PROCEEDING

On January 28, 2019, Peoples Natural Gas Company LLC (Peoples or PNG) filed a general rate increase request pursuant to Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d), and the Commission's regulations seeking, among other things, to combine the Retail and Supplier tariffs of PNG's Peoples and Equitable Divisions and to terminate the current gathering related charges to producers by instituting for all conventional gas production a uniform gathering service rate that starts at a base level and increases as the price of gas increases. On February 26, 2019, PIOGA filed and served its petition to intervene in this matter.

SERVICE LIST

PIOGA's entry on the service list is:

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ISSUES TO BE ADDRESSED

PIOGA's primary concern is Peoples' proposal, which PIOGA supports, to institute for all conventional gas production a uniform gathering service rate that starts at a base level and increases as the price of gas increases. PIOGA continues to review the filing to determine the extent to which other proposals and issues may affect the interests of PIOGA and its producer and natural gas supplier members in maintaining or increasing the availability and throughput of Pennsylvania natural gas on the Peoples' pipeline systems. PIOGA reserves the right to identify, address and raise other issues that may affect the interests of PIOGA and its members as well as to address issues raised by other parties that may affect those interests.

WITNESS AND SUBJECT MATTER OF TESTIMONY

PIOGA has not yet determined whether it will present witnesses or the specific subject matter of any testimony to address the issues identified above or the issues that may be raised by other parties, but will provide notice to Your Honor and the parties if PIOGA intends to do so.

PROPOSED LITIGATION SCHEDULE

The schedule proposed by Peoples is acceptable to PIOGA.


MODIFICATION OF DISCOVERY RULES

PIOGA has not yet served discovery but reserves the right to do so as the issues are developed by other parties' discovery and responses thereto. PIOGA is amenable to reasonable modifications to the Commission's discovery rules, such as those proposed by the Office of Consumer Advocate, as has become customary to accommodate reduced response times and email service and other concerns that arise.

SETTLEMENT

PIOGA is amenable to settlement discussions with any and all parties.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kevin J. Moody". The signature is written in a cursive style and is positioned above a horizontal line.

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Dated: March 11, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of PIOGA's Prehearing Conference Memorandum upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Via Email and First Class Mail, Postage Prepaid

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Date: March 11, 2019