



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Alessandra L. Hylander
Direct Dial: 717.237.5435
ahylander@mccneelaw.com

March 13, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: Pa. PUC v. Peoples Natural Gas Company LLC. Docket No. R-2018-3006818,
C-2019-_____**

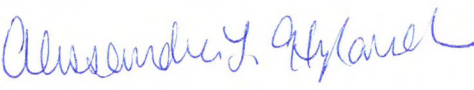
Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Memorandum of Peoples Industrial Intervenors ("PII") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being duly served with a copy of this document.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Alessandra L. Hylander

Counsel to Peoples Industrial Intervenors

Enclosure

c: Administrative Law Judge Joel H. Cheskis (via e-mail and First-Class Mail)
Certificate of Service

www.McNeesLaw.com

Harrisburg, PA • Lancaster, PA • Scranton, PA • State College, PA • Columbus, OH • Frederick, MD • Washington, DC

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST-CLASS MAIL

Anthony D. Kanagy, Esq.
Michael W. Gang, Esq.
Devin T. Ryan, Esq.
Andrew Watcher
Post and Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
akanagy@postschell.com
mgang@postschell.com
dryan@postschell.com
Peoples Natural Gas Company LLC

William H. Roberts II, Esq.
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
William.h.robertsii@peoples-gas.com

Harrison W. Breitman, Esq.
Christy Appleby, Esq.
Darryl A. Lawrence, Esq.
David T. Evrard, Esq.
J.D. Moore
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101
hbreitman@paoca.org
cappleby@paoca.org
dlawrence@paoca.org
devrard@paoca.org
jmoore@paoca.org

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

Erika McLain, Esq.
Carrie B. Wright, Esq.
Bureau of Investigation and Enforcement
Second Floor West
400 North Street
Harrisburg, PA 17120
ermclain@pa.gov
carwright@pa.gov

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@aol.com
Community Action Association of PA

Theodore J. Gallagher, Esq.
NiSource Corporate Services Company
Energy Distribution Group Legal
121 Champion Way, Suite 100
Canonsburg, PA 15317
tjgallagher@nisource.com
Columbia Gas of Pennsylvania, Inc.

Patrick Cicero, Esq.
John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Kadeem G. Morris, Esq.
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pciceropulp@palegalaid.net
emarxpulp@palegalaid.net
kmorrispulp@palegalaid.net
pulp@palegalaid.net
CAUSE-PA

Certificate of Service

Page 2

Todd S. Stewart, Esq.
Hawke McKeon and Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
NGS and RESA

Thomas J. Sniscak, Esq.
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17010
tjsniscak@hmslegal.com
The Pennsylvania State University

Daniel Clearfield, Esq.
Carl Shultz, Esq.
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
cshultz@eckertseamans.com
Direct Energy

John F. Povilaitis, Esq.
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101-1357
John.Povilaitis@bipc.com
Hess Corp.

Alan M. Seltzer, Esq.
Tanya Leshko, Esq.
Buchanan Ingersoll & Rooney
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
alan.seltzer@bipc.com
Equitrans LP

Emily M. Farah, Esq.
Tishekia Williams, Esq.
Michael Zimmerman, Esq.
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219
efarah@duqlight.com
twilliams@duqlight.com
mzimmerman@duqlight.com

Linda R. Evers, Esq.
Donald R. Wagner, Esq.
Stevens & Lee
111 North Sixth Street
Reading, PA 19601
lre@stevenslee.com
drw@stevenslee.com
Duquesne Light Company

Michael A. Gruin, Esq.
Stevens & Lee
16th Floor
17 North Second Street
Harrisburg PA 17101
mag@stevenslee.com
Duquesne Light Company

Kevin J. Moody, Esq.
Pennsylvania Independent Oil and 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*

Dante Mugrace
PCMG and Associates, LLC
90 Moonlight Court
Toms River, NJ 08753
dmugrace@pcmgregcon.com
*Consultant for Bureau of Investigation and
Enforcement*

Scott J. Rubin, Esq.
Law Office of Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com
UWUA Local 612

Certificate of Service

Page 3

Pamela C. Polacek, Esq.
Vicki Karandrikas, Esq.
Errin McCaulley, Esq.
McNees Wallace and Nurick LLC
100 Pine Street
Harrisburg, PA 17101
ppolacek@mcneeslaw.com
vkandrikas@mcneeslaw.com
emccaulley@mcneeslaw.com
Snyder Brothers, Inc. et al.

VIA FIRST-CLASS MAIL

Michael J. Healey, Esq.
Healey Block & Hornack, P.C.
247 Fort Pitt Boulevard, 4th Floor
Pittsburgh, PA 15222
United Steelworkers

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

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


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

Daniel Killmeyer
184 McKay Road
Saxonburg, PA 16056-9726

Charles F. Hagins
420 Goucher Street,
Johnstown, PA 15905

Sean Ferris
406 Laurie Drive
Penn Hills, PA 15235

Samuel Givens
132 Thunderbird Drive
McKeesport PA 15135-2138


Alessandra L. Hylander

Counsel to Peoples Industrial Intervenors

Dated this 13th day of March, 2019, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Peoples Industrial Intervenors	:	R-2018-3006818
	:	C-2019-_____
v.	:	
	:	
Peoples Natural Gas Company, LLC	:	

**PREHEARING MEMORANDUM OF
THE PEOPLES INDUSTRIAL INTERVENORS**

Pursuant to Administrative Law Judge ("ALJ") Joel H. Cheskis' March 4, 2019, Prehearing Conference Order, the Peoples Industrial Intervenors ("PII") hereby submit this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On January 28, 2019, Peoples Natural Gas Company LLC ("Peoples" or "Company") filed Retail Tariff Gas – Pa. P.U.C. No. 47 and Supplier Tariff Gas – Pa.P.U.C. No. S-3 to become effective March 29, 2019, containing proposed changes in rates, rules and regulations calculated to produce \$94.9 million (14.2%) in additional fully-projected future test year annual revenues. Peoples supplemented this request with the Direct Testimony of several witnesses, responses to filing requirements, and documentation regarding the Company's proposals.

On March 13, 2019, PII filed a Complaint in this proceeding. A description of PII is set forth in Paragraph 5 of PII's Complaint. A Prehearing Conference has been scheduled in this proceeding for March 14, 2019.

II. SERVICE LIST

For purposes of this proceeding, PII will be represented by the following counsel:

Charis Mincavage (Pa. I.D. No. 82039)
Alessandra L. Hylander (Pa. I.D. No. 320967)
McNEES WALLACE & NURICK LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
cmincavage@mcneeslaw.com
ahylander@mcneeslaw.com

Please direct all correspondence to the attention of Charis Mincavage; however, for purposes of electronic service lists, PII requests that both Ms. Mincavage and Ms. Hylander be included on any correspondence.

III. ANTICIPATED ISSUES AND SUB-ISSUES

PII's preliminary review of the Company's filing indicates the need for Commission investigation into at least the following issues:

- (a) Whether the size of the requested rate increase is appropriate;
- (b) Whether Peoples' proposals are just, reasonable, and consistent with the terms and conditions of the settlement approved by the PUC at Docket Nos. A-2013-2353647; A-2013-2353649; and A-2013-2353651;
- (c) Whether the allocation of the proposed increase among and within customer classes is just, reasonable, and non-discriminatory;
- (d) Whether the return on equity proposed by Peoples results in a fair rate of return;
- (e) Whether Peoples' claimed cost of service is accurate, legitimate, and appropriately allocated; and
- (f) Whether Peoples' requested rate increase appropriately reflects the principles of both cost of service and gradualism for all customers, including those moving from contract to tariff rates.

PII reserves the right to raise and address other issues of concern during the course of this proceeding.

IV. PROPOSED WITNESSES

PII is in the process of selecting a witness to sponsor testimony in this proceeding. Once PII retains its witness, it will immediately inform the parties and the ALJ of his/her name and topics of testimony. PII also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

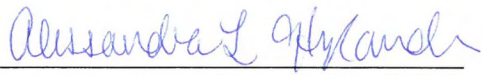
PII will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

VI. POSSIBILITY OF SETTLEMENT

PII is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage (Pa. I.D. No. 82039)
Alessandra L. Hylander (Pa. I.D. No. 320967)
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
cmincavage@mcneeslaw.com
ahylander@mcneeslaw.com

Dated: March 13, 2019

Counsel to the Peoples Industrial Intervenors