

April 30, 2019

The Honorable Mary D. Long
The Honorable Emily DeVoe
Administrative Law Judges
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

Re: Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc.

Docket Nos. A-2018-3006061

A-2018-3006062 A-2018-3006063

Dear Judge Long and Judge DeVoe:

Enclosed please find the **Rebuttal Testimony of Harry Geller on behalf of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA)** marked as CAUSE-PA Statement No. 1R with one appendix. Copies have been circulated pursuant to the attached Certificate of Service.

Thank you for your consideration. Please contact me with any questions or concerns.

very sincerely.

Patrick M. Cicero

Counsel for CAUSE-PA

Cc: Certificate of Service

PUC Secretary Chiavetta (cover letter and COS only)

BEFORE THE

PENNSYLVANIA PUBLIC UTILTY COMMISSION

Joint Application of Aqua America, Inc.,

Aqua Pennsylvania, Inc., Aqua

Pennsylvania Wastewater, Inc., Peoples

Natural Gas Company LLC and Peoples :

Gas Company LLC for all of the : Docket Nos. A-2018-3006061 Authority and Necessary Certificates of : A-2018-3006062

Public Convenience to Approve a : A-2018-3006063

Change in Control of Peoples Natural :

Gas Company LLC, and Peoples Gas : Company LLC by way of the Purchase of :

all of LDC Funding LLC's Membership
Interests by Aqua America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the attached **Rebuttal Testimony of**

Harry Geller on behalf of the Coalition for Affordable Utility Service and Energy

Efficiency in Pennsylvania upon the parties of record in the above-captioned proceeding in

accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons

listed below.

VIA FIRST CLASS MAIL AND EMAIL

The Honorable Mary D. Long
The Honorable Emily DeVoe
Administrative Law Judge
Michael W. Hassell, Esq.
Michael W. Gang, Esq.
Garrett P. Lent, Esq.

Pennsylvania Public Utility Commission Post & Schell

301 5th Avenue, Suite 220 17 N. 2nd Street, 12th Floor Pittsburgh, PA 15222 Harrisburg, PA 17101

E-mail: malong@pa.gov
E-mail: mhassell@postschell.com
E-mail: mgang@postschell.com
E-mail: glent@postshell.com

Counsel for Aqua

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

Counsel for Peoples

J.D. Moore, Esq. Christine Maloni Hoover, Esq. Darryl A. Lawrence, Esq. Harrison W. Breitman, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Forum Place Harrisburg, PA 17101

E-mail: AquaPeoples@paoca.org

Counsel for OCA

Matthew Eggerding, Esq. Equitrans Midstream Corp. 2200 Energy Drive Canonsburg, PA 15317 E-mail: meggerding@equitransmidstream.com Counsel for Equitrans, L.P.

Tanya C. Leshko, Esq. Alan M. Seltzer, Esq. Buchanan Ingersoll & Rooney PC 409 North Second Street, Suite 500 Harrisburg, PA 17101-1357 E-mail: alan.seltzer@bipc.com E-mail: Tanya.leshko@bipc.com

Kevin J. Moody, Esq. 212 Locust Street, Suite 300 Harrisburg, PA 17101-1510 E-mail: kevin@pioga.org Counsel for PIOGA

Counsel for Equitrans, L.P.

Jonathan Nase, Esq. Cozen O'Connor 17 North Second Street, Suite 1410 Harrisburg, PA 17101 inase@cozen.com Counsel for Peoples

Erin K. Fure, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 E-mail: efure@pa.gov Counsel for OSBA

Kimberly A. Joyce, Esq. Alexander R. Stahl, Esq. Aqua America, Inc. 762 West Lancaster Ave. Bryn Mawr, PA 19010 E-mail: kajoyce@aquaamerica.com

E-mail: astahl@aquaamerica.com

Counsel for Aqua

Melvin L. Vatz, Esq. Vatz Law 247 Fort Pitt Boulevard, 4th Floor Pittsburg, PA 15222 E-mail: mvatz@vatzlaw.com Counsel for Laborers' District Council of Western Pennsylvania

Scott J. Rubin, Esq. 333 Oak Lane Bloomsburg, PA 17815 E-mail: Scott.j.rubin@gmail.com Counsel for Utility Workers Union of America, Local 612

Brian Petruska, Esq. General Counsel

LiUNA, Mid-Atlantic Region 11951 Freedom Drive, Suite 310

Reston, VA 20190

E-mail: <u>bpetruska@maliuna.org</u>

Counsel for Laborers' International Union

Michael A. Gruin, Esq. Stevens & Lee

17 North 2nd Street, 16th Floor

Harrisburg, PA 17101

Email: mag@stevenslee.com
Email: tkm@stevenslee.com
Counsel for Duquesne Light Co

Linda R. Evers, Esq. Stevens & Lee 111 North 6th Street Reading, PA 19601

Email: <u>lre@stevenslee.com</u>

Counsel for Duquesne Light Co

Daniel Clearfield, Esq.
Deanne M. O'Dell, Esq.
Kristine Marsilio, Esq.
Eckert Seamans Cherin & Mellott, LLC

213 Market Street, 8th Floor Harrisburg, PA 17101

Email: Dclearfield@eckertseamans.com
Email: dodell@eckertseamans.com
Email: kmarsilio@eckertseamans.com

Counsel Direct Energy Business Marketing, LLC and Direct Energy Small Business, LLC

David T. Fisfis, Esq. Tishekia Williams, Esq. Duquesne Light Company 411 Seventh Avenue, 15th Floor

Pittsburgh, PA 15219 Email: dfisfis@duqlight.com

Email: twilliams@duqlight.com
Email: mzimmerman@duqlight.com
Counsel for Duquesne Light Co

Todd S. Stewart, Esq.

Hawke McKeon & Sniscak, LLP

100 North Tenth Street Harrisburg, PA 17101

Email: tsstewart@hmslegal.com

Counsel for Natural Suppler Parties and The

Retail Energy Supply Association

Carrie B. Wright, Esq. Erika L. McLain, Esq. Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement 400 North Street, 2 West Harrisburg, PA 17120

E-mail: carwright@pa.gov
E-mail: ermclain@pa.gov

Counsel for Bureau of Investigation and

Enforcement

VIA E-MAIL ONLY (Consultants)

James L. Crist, Consultant
Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
E-mail: JLCrist@aol.com
Expert Witness for Natural Gas Supplier
Parties and The Retail Energy Supply
Association

Barbara R. Alexander 83 Wedgewood Drive Winthrop, ME 04364 E-mail: <u>barbalax@ctel.net</u> Consultant for *Office of Consumer Advocate*

Ralph Smith, Consultant Larkin & Associates 15728 Farmington Road Livonia, MI 48154 E-mail: RSmithLS@aol.com Consultant for Office of Consumer

Advocate

Robert D. Knecht, Consultant Industrial Economics, Inc. 2067 Massachusetts Avenue Cambridge, MA 02140 rdk@indecon.com Consultant for Office of Small Business Advocate

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

Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 08478
roger@fsconline.com
Consultant for Office of Consumer Advocate

VIA MAIL ONLY (No E-Mail Provided)

Matthew Kahal 1108 Pheasant Xing Charlottesville, VA 22901 Consultant for *Office of Consumer Advocate*

Orlando Magnani Rand Energy Consultants, LLC 19561 Caladesi Drive Estero, FL 33967 Consultant for *Direct Energy* Clifford W. Baker, Senior Vice President John M. Quinn, Vice President – Rates P. Robert Pichardo, III, Esq. Equitrans Midstream Corp. 2200 Energy Drive Canonsburg, PA 15317 Representing *Equitrans Midstream Corp*.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT

is his

Counsel for CAUSE-PA

Patrick M. Cicero, Esq.,

PA ID: 89039 118 Locust Street Harrisburg, PA 17101

717-236-9486

pciceropulp@palegalaid.net

April 30, 2019