

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**EXCEPTION OF THE
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION
TO COMPLIANCE FILING**

Pursuant to 52 Pa. Code § 5.592 (C), the Pennsylvania Independent Oil & Gas Association (PIOGA) files this exception to the compliance filing of Peoples Natural Gas Company.

1. On October 7, 2019, Peoples made its compliance filing in this proceeding.
2. Rate AGS requires execution of a meter interconnect & measurement agreement (MIMA) for service under rate AGS.
3. Prior to the PUC's order approving the settlement in this matter, Peoples circulated the proposed MIMA to PIOGA for review and comment.
4. During the proceeding, Peoples provided a representative non-executed MIMA in discovery (Peoples response to SBI-I-50).
5. Peoples' proposed MIMA referenced in paragraph 3 above contains provisions imposing:
(i) new and additional obligations and costs; (ii) changing existing obligations and costs; and (iii) affecting substantive rights of producers, none of which were raised during the proceeding.
6. The provisions referenced in paragraph 5 remain under negotiation between PIOGA and Peoples.

7. Accordingly, the docket should not be marked closed until those discussions are complete because unresolved issues may be required to be brought to the PUC for decision.

WHEREFORE, PIOGA respectfully requests the docket to remain open in accordance with the statements above and that any MIMAs already executed be replaced with the final MIMA determined pursuant to this exception.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kevin J. Moody". The signature is written in a cursive, flowing style.

Kevin J. Moody, Esquire
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Dated: October 17, 2019

VERIFICATION

I, Daniel J. Weaver, President and Executive Director of the Pennsylvania Independent Oil & Gas Association (PIOGA), hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that PIOGA expects to be able to prove the same at a hearing held in these proceedings. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink, appearing to read "Daniel J. Weaver". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel J. Weaver

Date: October 17, 2019

CERTIFICATE OF SERVICE

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

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