

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2023-3044549
	:	
Peoples Natural Gas Company LLC	:	

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**PETITION TO INTERVENE  
OF THE  
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

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Pursuant to 52 Pa. Code § 5.72-5.75, the Pennsylvania Independent Oil & Gas Association (PIOGA) petitions to intervene in this proceeding. In support of its intervention, PIOGA avers as follows.

1. PIOGA is the principal nonprofit trade association representing oil and natural gas interests in Pennsylvania. PIOGA’s members include natural gas producers and Pennsylvania Public Utility Commission-licensed natural gas suppliers and marketers (NGSs) that produce, transport and market natural gas, including production from Pennsylvania conventional and unconventional formations, on the pipelines of Peoples Natural Gas Company LLC (Peoples Natural Gas Division and Peoples Gas Division, “PNG” or “Peoples”) for system supply and to transportation customers.

2. Through its pipelines PNG provides gathering and related services to PIOGA producer members and other services to PIOGA’s NGS members.

3. On December 29, 2023, Peoples 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. In addition to an overall revenue increase of approximately \$156.0 million annually, the filing seeks, among other things, to unify the distribution rates of its two divisions as well as a total consolidation of each division's officially filed tariffs.

4. PIOGA producer members currently pay for gathering system costs and services on the Peoples Natural Gas Division pipelines ("PNGD", f/k/a Peoples and Equitable Divisions) through a gathering rate and retainage per Rate AGS (Appalachian Gathering Service ) imposed on the movement of natural gas through the gathering system as well as deliveries of natural gas directly into PNGD's distribution and transmission system.

5. Peoples' total consolidation of each division's tariffs includes application of PNGD's existing Rate AGS gathering rate, terms and conditions of service to the movement of natural gas through the Peoples Gas Division's ("PGD", f/k/a Peoples Gas Company LLC) gathering system as well as deliveries of natural gas directly into PGD's distribution and transmission system, to replace PGD's existing Rate GS (Gathering Service) that imposes no gathering rate on deliveries of conventional well gas directly into PGD's pipeline system.

6. PIOGA's producer and NGS members will be directly affected by PNG's tariff modifications and changes.

7. PIOGA and its members will be bound by the PUC's determinations in these proceedings.

8. PIOGA's interests and the interests of its members cannot be adequately represented by any other party in this proceeding, including any PIOGA member that may participate individually that may raise issues specific to its relationships with PNG or any other non-PIOGA member producer or NGS.

9. PIOGA's intervention is also in the public interest. PIOGA has consistently participated in Peoples's previous base rate proceedings and annual Section 1307(f) proceedings as well as: (i) the acquisition of Equitable Gas Company by the owners of the Peoples Natural Gas Company LLC; (ii) Aqua America's acquisition of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples Gas Company LLC (f/k/a Peoples TWP LLC); and (iii) the merger of Peoples Natural Gas Company LLC (Peoples and Equitable Divisions) and Peoples Gas Company LLC, all of which places PIOGA in a position to contribute to the development of the record in this matter.

**WHEREFORE**, PIOGA respectfully requests that its petition to intervene in this proceeding be granted.

Respectfully submitted,



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Dated: January 8, 2024

## 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).



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Daniel J. Weaver

Date: January 8, 2024

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of PIOGA's Petition to Intervene 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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Kevin J. Moody, Esquire  
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Date: January 8, 2024