

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2023-3044549
Office of Consumer Advocate	:	C-2024-3045268
Office of Small Business Advocate	:	C-2024-3045385
v.	:	
	:	
Peoples Natural Gas Company LLC	:	

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

To the Honorable Mary D. Long, 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 January 23, 2024, the Pennsylvania Independent Oil & Gas Association (PIOGA) submits this prehearing conference memorandum.

BRIEF HISTORY OF PROCEEDING

On December 29, 2023, Peoples Natural Gas Company LLC (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 seeking, among other things, unification of the tariffs of Peoples Natural Gas Division (PNGD) and Peoples Gas Division (PGD) into proposed Tariff Gas – PA PUC No. 48 and application of PNGD’s Rate AGS and the Allegheny Valley Capacity (AVC) Charge to the PGD system.

The Office of Consumer Advocate (OCA) and the Office of Small Business Advocate (OSBA) filed complaints, and the Commission’s Bureau of Investigation and Enforcement (I&E) entered an appearance. On January 8, 2024, PIOGA filed and served its petition to intervene in this matter.

Thereafter, the Pennsylvania Weatherization Provider's Task Force Inc. (PWPTF) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed petitions to intervene.

By Commission order entered January 18, 2024, the effective date of proposed Tariff No. 48 was suspended by operation of law until September 27, 2024, and an investigation initiated into the lawfulness, justness, and reasonableness of the rates, rules, and regulations of Tariff No. 48 as well as consideration of the reasonableness of Peoples' existing rates, rules, and regulations.

SERVICE LIST

PIOGA's entry on the service list is:

Kevin J. Moody, Esquire
General Counsel
Pennsylvania Independent Oil & Gas Association
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510
(717) 234-8525, ext. 113
Cell: 717-525-1556
Fax: 717 234-8812
kevin@pioga.org

ISSUES TO BE ADDRESSED

PIOGA intends to address measures to reverse the decline in conventional production on the Peoples' system, the unification of the tariffs of PNGD and PGD, and the rates, terms and conditions of Rate AGS. PIOGA reserves the right to address other issues that may affect the interests of PIOGA and its producer and natural gas supplier (NGS) members as well as to address issues raised by other parties that may affect those interests.

WITNESS AND SUBJECT MATTER OF TESTIMONY

PIOGA intends to present one or more witnesses but has not yet determined whom, or the specific subject matter of the testimony, to address the issues identified above or other issues that may be raised by other parties.

PROPOSED LITIGATION SCHEDULE

PIOGA understands that most of the parties, including PIOGA, have agreed to a litigation schedule.

Respectfully submitted,



Kevin J. Moody, Esquire
I.D. No. 34367
General Counsel
Pennsylvania Independent Oil & Gas Association
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510
(717) 234-8525
Fax: (717) 234-8812

Dated: February 1, 2024

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 only

THE HONORABLE MARY D. LONG, ADMINISTRATIVE LAW JUDGE
malong@pa.gov

MEAGAN MOORE, ESQ.
PNG COMPANIES LLC
375 NORTH SHORE DRIVE, 4TH FL.
PITTSBURGH, PA 15212
meagan.moore@peoples-gas.com
Counsel for Peoples Natural Gas Company LLC

MICHAEL W GANG ESQUIRE
ANTHONY KANAGY ESQUIRE
NICHOLAS A. STOBBE, ESQUIRE
POST & SCHELL PC
12TH FLOOR
17 NORTH SECOND STREET
HARRISBURG PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
NStobbe@PostSchell.com
Counsel for Peoples Natural Gas Company LLC

SCOTT B. GRANGER, ESQUIRE
BUREAU OF INVESTIGATION & ENFORCEMENT
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, 2ND FLOOR WEST
P. O. BOX 3265
HARRISBURG, PA 17105-3265
sgranger@pa.gov

ARON J. BEATTY, SENIOR ASSISTANT CONSUMER ADVOCATE
CHRISTOPHER M. ANDREOLI, ASSISTANT CONSUMER ADVOCATE
GINA L. MILLER, ASSISTANT CONSUMER ADVOCATE
JACOB D. GUTHRIE, ASSISTANT CONSUMER ADVOCATE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET, 5TH FLOOR, FORUM PLACE
HARRISBURG, PA 17101-1923
OCAPNG2023BRC@PAOCA.ORG

STEVEN C. GRAY, ESQUIRE
REBECCA LYTTLE, ESQUIRE
OFFICE OF SMALL BUSINESS ADVOCATE
555 WALNUT STREET
1ST FLOOR, FORUM PLACE
HARRISBURG, PA 17101-1923
sgray@pa.gov
relyttle@pa.gov

ELIZABETH R MARX ESQUIRE
JOHN W SWEET ESQUIRE
PENNSYLVANIA UTILITY LAW PROJECT
118 LOCUST ST
HARRISBURG PA 17101
pulp@palegalaid.net
Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania

JOSEPH L. VULLO, ESQUIRE
BURKE VULLO REILLY ROBERTS
1460 WYOMING AVENUE
FORTY FORT, PA 18704
jlv@bvrrlaw.com
Counsel for Community Action Association of Pennsylvania

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.

Kevin J. Moody, Esquire
General Counsel, PIOGA

Date: February 1, 2024

