

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

May 17, 2011

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

RE: Peoples Independent Producers  
Group v. Peoples Natural Gas,  
Docket No. C-20054393

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate's Prehearing Memorandum, in the above referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "James A. Mullins".

James A. Mullins  
Assistant Consumer Advocate  
PA Attorney I.D. # 77066

Enclosure

cc: Hon. Wayne L. Weismandel  
00143277

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peoples Independent Producers Group	:	
	:	
v.	:	Docket No. C-20054393
	:	
Peoples Natural Gas Company, LLC	:	

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FURTHER CONFERENCE MEMORANDUM OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. §333, 52 Pa. Code §5.222, and in response to the Further Conference Order issued in the above-captioned matter by Administrative Law Judge (ALJ) Wayne L. Weisman, the Office of Consumer Advocate (OCA) provides this Further Conference Memorandum.

**I. INTRODUCTION**

As was the case with when this proceeding was initiated, the OCA submits that the allegations made in Peoples Independent Producers Group (PIPG) Formal Complaint could have an impact on the use of locally produced natural gas to serve customers on the Peoples Natural Gas Company, LLC (Peoples or Company) system. In addition, this case raises questions about the quality of natural gas being transported on Peoples' system and whether natural gas quality issues pose a threat to the integrity of the Company's distribution system and end-use consumers' natural gas burning equipment. For these reasons, the OCA originally filed a Notice of Intervention in this proceeding for the purpose of monitoring the issues raised by the parties. At the present time, the OCA anticipates continuing to adopt a monitoring posture.

## **II. SERVICE ON OCA**

The OCA will be represented in this case by Assistant Consumer Advocates James A. Mullins and David T. Evrard. The OCA requests that two copies of all documents be served on the OCA as follows:

David T. Evrard  
James A. Mullins  
Assistant Consumer Advocates  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
Telephone: (717) 783-5048  
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E-mail: [devrard@paoca.org](mailto:devrard@paoca.org)  
[jmullins@paoca.org](mailto:jmullins@paoca.org)

## **III. PROCEDURAL SCHEDULE AND DISCOVERY ISSUES**

The OCA will agree to any reasonable procedural schedule that the other parties develop. The OCA will also agree to any reasonable plan and schedule for discovery.

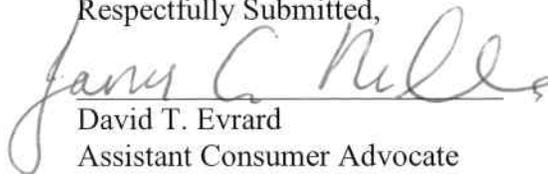
## **IV. WITNESSES**

At this time, the OCA does not intend to present any direct testimony or other evidence in this proceeding and therefore is not in the position to identify potential witnesses. The OCA reserves the right to respond to the testimony presented by other parties if necessary. If the OCA determines that it is necessary to respond to the testimony of any other parties, it will make prompt notification of its intent to do so and provide the identity of any witnesses that it intends to call.

**V. ISSUES AND SUB-ISSUES**

At this point, the OCA has not identified any specific issues that it intends to raise in this proceeding. The OCA has intervened in this matter primarily for the purposes of monitoring the issues raised by other parties to ensure that they do not have an adverse impact on Peoples' customers. The OCA, however, reserves the right to respond to any issues that other parties raise that may have an adverse impact upon the Company's customers.

Respectfully Submitted,



David T. Evrard  
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PA Attorney I.D. # 77066  
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Counsel for:  
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Consumer Advocate

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May 17, 2011

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CERTIFICATE OF SERVICE

Peoples Independent Producers Group :  
 :  
 v. : Docket No. C-20054393  
 :  
 Peoples Natural Gas Company, LLC :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Further Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 17<sup>th</sup> day of May 2011.

SERVICE BY E-MAIL and INTEROFFICE MAIL

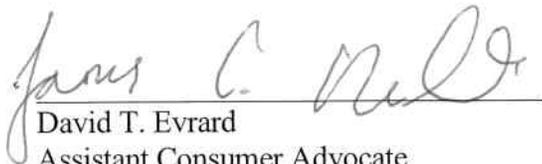
Richard A. Kanaskie, Esquire  
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