



National Fuel

Maureen Geary Krowicki
Attorney

August 15, 2012

VIA E-FILING AND FIRST CLASS MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re. Generic Investigation of Gas on Gas
Competition Issues, Docket No.
P-2011-2277868

Dear Secretary Chiavetta:

Enclosed please find an e-filing copy of the Petition to Intervene of
National Fuel Gas Distribution Corporation.

Should you have any questions concerning this filing, please feel free to
contact me.

Very truly yours,

Maureen Geary Krowicki
Attorney for National Fuel Gas
Distribution Corporation.

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Generic Investigation of Gas-On-Gas
Competition**

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**Docket No. P-2001-2277868
PETITION TO INTERVENE**

**PETITION TO INTERVENE OF NATIONAL FUEL GAS
DISTRIBUTION CORPORATION**

National Fuel Gas Distribution Corporation (“NFGDC”), by and through its undersigned attorney, hereby files this Petition to Intervene in the above-captioned matter pursuant to 52 Pa. Code § 5.71 through 5.74. In support of this Petition, NFGDC hereby avers as follows:

1. NFGDC is a certificated natural gas distribution company providing service to approximately 209,000 (as of June 30, 2012) customers in Pennsylvania.
2. By way of secretarial letter dated July 25, 2012, NFGDC was informed that the Commission had decided, in response to a December 8, 2011 joint petition filed by the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, Peoples TWP LLC and Peoples Natural Gas Company to assign to the Office of Administrative Law Judge the task of addressing, on a generic basis, “issues related to a NGDC’s flexing of distribution rates to meet the lower rates from other NGDCs and the treatment of flexed revenues for ratemaking purposes in future ratemaking proceeding” and that

“other interested parties are invited to file interventions in order to participate in these proceedings.”


3. NFGDC has service territories which partially overlap the service territories of other un-affiliated NGDCs.

4. Competition via flex rates could be occurring in those areas of overlap currently and/or could occur there in the future.

5. NFGDC accordingly believes that it has a direct interest in the issues that may be addressed in the generic investigation and that its interests are not adequately represented by any party.

WHEREFORE, for the foregoing reasons, NFGDC respectfully requests that the Commission grant it leave to intervene in the above-captioned proceeding.

Respectfully submitted,



Maureen Geary Krowicki
Pa. I.D. No. 89350
National Fuel Gas Distribution Corporation
P.O. Box 2081
Erie, PA 16512
(814) 871-8035
(814) 871-8061 *fax*
krowickim@natfuel.com

Attorney for National Fuel Gas Distribution Corporation

Dated: August 15, 2012

VERIFICATION

Carl M. Carlotti deposes and says that he is Senior Vice President for National Fuel Gas Distribution Corporation, that he is duly authorized to and does make this Verification on behalf of National Fuel Gas Distribution Corporation; that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information and belief; and that this verification is made subject to the penalties of 18 Pa. C.S. 4904 (relating to unsworn falsification to authorities).



Carl M. Carlotti

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Petition to Intervene upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party). **Via First Class Mail & Electronic Mail:**

Tanya J. McCloskey
Shaun A. Sparks
James A. Mullins
Office Of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1921
tmccloskey@paoca.org
ssparks@paoca.org
jmullins@paoca.org

Allison C. Kaster
Bureau of Investigations and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

Jay W. Dawson
Vice President and Secretary
Peoples TWP LLC
205 N. Main Street
Butler, PA 16001
Jay.Dawson@peoplestwp.com

Theodore J. Gallagher
Senior Counsel
Nisource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg PA 15317
tjgallagher@nisource.com

Dated: August 15, 2012

Steven C. Gray
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
sgray@pa.gov

Pamela C. Polacek
Teresa K. Schmittberger
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mwn.com
tschmittberger@mwn.com

William Roberts II
Senior Counsel
Peoples Natural Gas Company LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212
William.H.Roberts@Peoples-Gas.com



Maureen Geary Krowicki, Esquire
National Fuel Gas Distribution Corporation
P.O. Box 2081
Erie, PA 16512
(814) 871-8035