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August 17, 2012

**VIA ELECTRONICALLY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Joint Petition Requesting that the PA Public Utility Commission Institute a Generic Investigation or Rulemaking to address distribution base rate discounting among natural gas distribution companies (NGDC's) with overlapping service territories regarding Gas-On-Gas Competition between Jurisdictional Natural Gas Distribution Companies; Docket No. P-2011-2277868; **THE PENNSYLVANIA STATE UNIVERSITY'S PETITION TO INTERVENE**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is The Pennsylvania State University's ("PSU") Petition to Intervene. Copies of this document were served according to the certificate of service.

Thank you very much for your attention to this matter. Please feel free to contact the undersigned at 717-236-1300 with any questions.

Very truly yours,

Thomas J. Sniscak  
William E. Lehman

*Counsel to The Pennsylvania State University*

TJS/das

Enclosures

cc: Honorable Elizabeth H. Barnes  
Per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition Requesting that the PA Public :  
Utility Commission Institute a Generic :  
Investigation or Rulemaking to address :  
distribution base rate discounting among :  
natural gas distribution companies (NGDC's) :                   Docket Nos. P-2011-2277868  
with overlapping service territories regarding :  
Gas-On-Gas Competition between :  
Jurisdictional Natural Gas Distribution :  
Companies. :

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**PETITION TO INTERVENE OF  
THE PENNSYLVANIA STATE UNIVERSITY**

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NOW COMES The Pennsylvania State University (“PSU”), by and through its attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, PSU avers as follows:

1. On July 25, 2012, the Commission issued a Secretarial Letter directing the Office of Administrative Law Judge, through a generic proceeding, to address “the issues related to an 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 proceedings.” The Secretarial Letter also requested that “other interested parties are invited to file interventions in order to participate in these proceedings.”

2. PSU seeks to intervene and requests that it be placed on the Commission’s official Service List for this docket.

3. All correspondence and pleadings in this docket should be directed to PSU's counsel in this matter:

Thomas J. Sniscak, Esquire  
William E. Lehman, Esquire  
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4. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

5. PSU has such an interest. PSU is a customer of Peoples Natural Gas Company, LLC ("Peoples") for natural gas service at two separate branch campuses, Penn State Altoona and Penn State New Kensington. For those two campuses in 2011, PSU purchased 31,500 mcf of gas which Peoples delivered. In addition, PSU is a customer of Columbia Gas of Pennsylvania, Inc. ("Columbia Gas") for natural gas service for a number of separate accounts under the following tariff rate classifications: LDS (Large Distribution Service), SDS (Small Distribution Service), SGSS (Small Generation Sales Service) and RSS (Residential Sales Service). The rate, economic, and service interests of PSU can be affected by the outcome of this investigation.

6. For the reasons stated above, PSU's intervention in this matter meets the intervention standards of 52 Pa. Code § 5.72, and is otherwise in the public interest.

WHEREFORE, The Pennsylvania State University respectfully requests it be granted  
intervener status in the above-captioned matter.

Respectfully submitted by:

Thomas J. Sniscak

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*Counsel for  
The Pennsylvania State University*

DATED: August 17, 2012

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Thomas J. Sniscak  
William E. Lehman

Dated this 17<sup>th</sup> day of August, 2012