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April 10, 2013

VIA ELECTRONIC FILING

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

Re: Joint Petition for Generic Investigation or Rulemaking Regarding “Gas-On-Gas”
Competition Between Jurisdictional Natural Gas Distribution Companies; Docket No.
P-2011-2277868

Generic Investigation Regarding Gas-On-Gas Competition Between Jurisdictional
Natural Gas Distribution Companies; Docket No. I-2012-2320323

**THE PENNSYLVANIA STATE UNIVERSITY’S ANSWER TO MOTION
FOR PROTECTIVE ORDER**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is The Pennsylvania State University’s (“PSU”) Answer to Motion for Protective Order. 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

CERTIFICATE OF SERVICE

Docket Nos. P-2011-2277868 & I-2012-2320323

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).

Via USPS First Class Mail

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CERTIFICATE OF SERVICE

Docket Nos. P-2011-2277868 & I-2012-2320323

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Thomas J. Sniscak
William E. Lehman

Dated this 10th day of April, 2013

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition for Generic Investigation or Rulemaking Regarding "Gas-on-Gas" Competition Between Jurisdictional Natural Gas Distribution Companies	:	
	:	
	:	Docket No. P-2011-2277868
	:	
	:	
Generic Investigation Regarding Gas-On-Gas Competition Between Jurisdictional Natural Gas Distribution Companies;	:	
Docket No. I-2012-2320323	:	Docket No. I-2012-2320323
	:	
	:	

**ANSWER OF THE PENNSYLVANIA STATE UNIVERSITY
TO MOTION FOR PROTECTIVE ORDER**

TO THE HONORABLE ELIZABETH H. BARNES:

The Pennsylvania State University (PSU) files this Answer to the *Motion for Protective Order* ("Motion") filed with the Commission on April 3, 2013, by Peoples Natural Gas Company, LLC, and Peoples TWP LLC (together, "Peoples") at the above-captioned proceeding. PSU is an intervenor in the instant proceeding.

1. PSU presently does not plan to have its expert review customer-specific information in this proceeding. That may change as testimony is submitted by other parties in this matter, particularly if it is contrary to PSU's interests. PSU reserves its due process rights to challenge at that time, if necessary, the Protective Order if adopted should it impair PSU's expert's ability to analyze information produced in discovery and to provide testimony and other evidence in response to adverse positions other parties may take whose expert witnesses have been given access to information that PSU's expert has not.

Respectfully submitted by:



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Date: April 10, 2013

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