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May 15, 2013

Administrative Law Judge Elizabeth H. Barnes
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

VIA FIRST CLASS MAIL

**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**

Dear Judge Barnes:

On April 10, 2013, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, and the Office of Small Business Advocate (collectively, the "State Advocates") filed an Answer to the Peoples Natural Gas Company, LLC, and Peoples TWP, LLC, Motion for Protective Order. As part of this Answer, the State Advocates also requested that the procedural schedule in the above-referenced proceeding be postponed by approximately two months. On May 2, 2013, Your Honor directed parties to file responses to the State Advocates' request for a delayed procedural schedule.

While the Industrial Energy Consumers of Pennsylvania ("IECPA") have significant concerns with respect to the elongated delay proposed in the State Advocates' procedural schedule, IECPA has decided not to actively oppose the State Advocates' request to extend the remaining dates on the procedural schedule by approximately two months. In an Answer filed on February 1, 2013, regarding potential abeyance of the proceeding, IECPA highlighted a number of concerns related to further delay of the instant investigation, including the issues that could arise if the delay would result in conclusion of the gas-on-gas investigation after the Pennsylvania Public Utility Commission ("PUC" or "Commission") concludes its review of the proposed acquisition of Peoples Natural Gas Company, LLC ("Peoples"), and Equitable Gas Company, LLC ("Equitable"). Although IECPA is still troubled by this eventuality, IECPA acknowledges the elongated protective order negotiations that occurred as part of the instant proceeding.¹ As a result, in order to ensure that all parties have an opportunity for reasonable discovery, IECPA will not oppose the modified procedural schedule offered within the State Advocates' April 10, 2013, Answer; however, IECPA is hopeful that the PUC will remain cognizant of the implications of this proceeding as it moves forward on a more expedited schedule with respect to the Peoples/Equitable acquisition proceeding.

¹For that reason, in its Answer in response to Peoples' Motion for Protective Order, IECPA proposed a two-week extension to the procedural schedule.

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If you have any questions related to IECPA's foregoing position, please do not hesitate to contact us.
Thank you for your attention.

Respectfully,

McNEES WALLACE & NURICK LLC

By 

Pamela C. Polacek
Charis Mincavage
Teresa K. Schmittberger

Counsel to the Industrial Energy Consumers of Pennsylvania

c: Rosemary Chiavetta
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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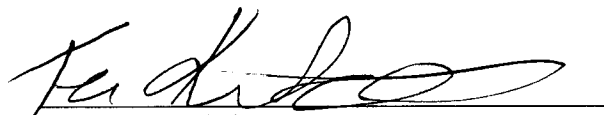
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Dated this 15th day of May, 2013, at Harrisburg, Pennsylvania