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August 8, 2013

Hon. Elizabeth H. Barnes
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17015

Re: Joint Petition for Generic Investigation or :
Rulemaking Regarding “Gas-On-Gas” Competition : P-2011-2277868
Between Jurisdictional Natural Gas Distribution :
Companies :
:
Generic Investigation Regarding Gas-On-Gas :
Competition Between Jurisdictional Natural : I-2012-2320323
Gas Distribution Companies :

Dear Judge Barnes:

Pursuant to Your Honor’s Order dated May 16, 2013, direct testimony is due in the above-referenced proceeding on August 8, 2013.


As has been disclosed to the various parties in discovery in this case, National Fuel Gas Distribution Corporation (“Distribution” or “the Company”) currently does not offer any discount from its tariffed rates in order to meet competition from another gas distribution utility (“gas-on-gas competition”).

Beyond stating that Distribution does not currently offer discounted rates to meet gas-on-gas competition, the Company has not formulated a position as to the propriety or efficacy of such rates. Consequently, at this point, Distribution will not be offering direct testimony.

Of course, if another party should present a position that would adversely affect Distribution now, or in the future, the Company reserves the right to respond to such a presentation with testimony and other evidence in the rebuttal phase of this case.

Copies of this letter have been served on all active parties and it has been filed with the Secretary in the same manner as testimony would have been filed.

Very truly yours,



Bruce V. Miller
Counsel to National Fuel Gas Distribution Corp.

cc: Hon. Elizabeth H. Barnes
All Parties