



Todd S. Stewart  
Office: 717 236-1300 x242  
Direct: 717 703-0806  
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

October 2, 2013

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Duquesne Light Company; Docket No. R-2013-2372129; **PREHEARING CONFERENCE MEMORANDUM OF INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of Interstate Gas Supply, Inc. in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
*Counsel for Interstate Gas Supply, Inc.*

TSS/jld

Enclosures

cc: Administrative Law Judge Conrad A. Johnson (via email and via overnight delivery)  
Per Certificate of Service

## 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).

### VIA ELECTRONIC AND FIRST CLASS MAIL

Candis A. Tunilo, Esquire  
David T. Evrard, Esquire  
Amy E. Hirakis, Esquire  
Office of Consumer Advocate  
555 Walnut Street - 5th Floor  
Harrisburg, PA 17101  
[ctunilo@paoca.org](mailto:ctunilo@paoca.org)  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[ahirakis@paoca.org](mailto:ahirakis@paoca.org)

Robert H. Hoaglund, II, Esquire  
Tishekia E. Williams, Esquire  
Duquesne Light Company  
411 Seventh Avenue - 16th Floor  
Pittsburgh, P A 15219  
[rhoaglund@duglight.com](mailto:rhoaglund@duglight.com)  
[twilliams@duglight.com](mailto:twilliams@duglight.com)

Theodore S. Robinson  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217  
[robinson@citizenpower.com](mailto:robinson@citizenpower.com)

Derrick Price Williamson, Esquire  
Barry A. Naum, Esquire  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Ste. 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)

Charles Daniel Shields, Esquire  
Bureau of Investigation & Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105  
[chshields@pa.gov](mailto:chshields@pa.gov)

Pamela C. Polacek, Esquire  
McNees Wallace & Nurick  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[ppolacek@mwn.com](mailto:ppolacek@mwn.com)

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[Scott.j.rubin@gmail.com](mailto:Scott.j.rubin@gmail.com)

Michael W. Gang, Esquire  
Anthony D. Kanagy, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Harry S. Geller, Esquire  
Patrick M. Cicero, Esquire  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jvullo@aol.com](mailto:jvullo@aol.com)

A handwritten signature in black ink, appearing to read "Todd S. Stewart", written over a horizontal line.

Todd S. Stewart

Dated: October 2, 2013

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2013-2372129
	:	
Duquesne Light Company	:	
	:	

---

**PREHEARING CONFERENCE MEMORANDUM  
OF INTERSTATE GAS SUPPLY, INC.**

---

**AND NOW**, comes Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”), pursuant to 52 Pa. Code § 5.222(d)(1), and hereby submits its Prehearing Conference Memorandum in compliance with the Presiding Administrative Law Judge’s Prehearing Conference Order of September 25, 2013 in the above-captioned matter.

**I. PROCEDURAL HISTORY**

1. On or about August 4, 2013, Duquesne Light Company (“DLC”) initiated the above-captioned proceeding by filing Supplement No. 81 to its Tariff Electric – Pa.P.U.C. No. 24. Supplement No. 81 proposes a general rate increase in DLC’s electric distribution rates of approximately \$76.3 Million and proposes other changes to DLC’s tariffs.

2. On September 27, 2013, IGS filed a Petition to Intervene in the above-captioned matter. To date, no party has objected to IGS’ Petition to Intervene.

3. A Prehearing Conference currently is scheduled to be held before Presiding Administrative Law Judge Conrad A. Johnson on October 4, 2013.

## **II. ISSUES FOR LITIGATION**

4. IGS has been reviewing the rate case filing, the discovery responses provided to date, and the pre-filed testimony of DLC. IGS has not yet identified any issues for which it would provide testimony in this case. IGS nonetheless reserves its right to submit testimony at any appropriate juncture, if it believes it is necessary to do so. IGS stated in its Petition to Intervene that IGS intends to focus on ensuring that nothing in this case, in any Tariffs that DLC seeks to have approved as part of the litigation, or otherwise, will have any negative impact on its ability to fairly compete in the DLC service territory, or negative impacts on its customers' ability to shop freely.

## **III. WITNESSES**

5. IGS has not yet concluded whether it will present the testimony of any witness or will present any issues in this matter, but reserves the right to do so at any appropriate juncture. IGS has not identified the need for a witness, whether it will call a witness, or the identity of any witnesses at this time. If IGS concludes that a witness is necessary, it will notify the Presiding Administrative Law Judge and other parties as soon as practicable.

## **IV. COUNSEL**

6. IGS is represented in the above-captioned matter by the following counsel, and requests the service of all documents submitted in this proceeding be made upon him:

Todd S. Stewart, Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
P.O. Box 1778  
100 N. Tenth Street  
Harrisburg, PA 17105-1778  
(717) 703-0806  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

**V. SCHEDULE**

7. On September 30, 2013, DLC circulated a proposed schedule for litigation in this proceeding. IGS has no objection to the implementation of the schedule as proposed by DLC. To the extent that DLC's proposed schedule is not acceptable to all parties, IGS will cooperate with all Parties to develop a schedule that is acceptable to all.

**VI. DISCOVERY**

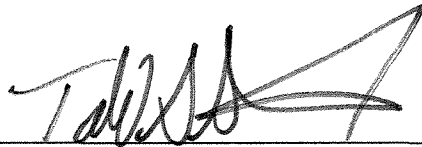
8. IGS does not presently intend to engage in discovery, but will attempt to support and cooperate in the preparation of a discovery schedule and any modifications to the discovery rules that are suitable to all parties in this proceeding.

**VII. SETTLEMENT**

9. IGS is willing to engage in settlement discussions with any party of any time throughout the course of this proceeding.

WHEREFORE, IGS respectfully submits this Prehearing Conference Memorandum in preparation for the Prehearing Conference scheduled for October 4, 2013.

Respectfully submitted,



---

Todd S. Stewart  
Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
P.O. Box 1778  
100 N. Tenth Street  
Harrisburg, PA 17105-1778  
(717) 236-1300  
(717) 236-4841 (fax)  
tsstewart@hmslegal.com

*Counsel for Interstate Gas Supply, Inc.*

Dated: October 2, 2013