



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 2271/152314

May 7, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2014-2407345**

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Memorandum of Columbia Gas of Pennsylvania, Inc. in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'DR', written over a horizontal line.

Devin Ryan

DR/skr
Enclosure

cc: Honorable Mark A. Hoyer
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Candis A. Tunilo, Esquire
Amy E. Hirakis, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Regina L. Matz, Esquire
Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
PO Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Daniel G. Asmus, Esquire
Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Charis Mincavage, Esquire
Elizabeth P. Trinkle, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105

Patrick M. Cicero, Esquire
Harry S. Geller, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704

Date: May 7, 2014



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2014-2407345
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**PREHEARING MEMORANDUM OF
COLUMBIA GAS OF PENNSYLVANIA, INC.**

TO ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated April 28, 2014 in the above-captioned proceeding, Columbia Gas of Pennsylvania, Inc. (“Columbia”) hereby submits this Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

On February 26, 2014, Columbia filed with the Pennsylvania Public Utility Commission (“Commission”) Supplement No. 210 to its Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 210”). Supplement No. 210, which was issued February 26, 2014, and was to be effective April 28, 2014, proposes a Pilot Rider New Area Service (“NAS”) to make natural gas service more accessible to residential customers and developers of new residential plans in Columbia’s certificated service territory.

On March 13, 2014, the Office of Consumer Advocate (“OCA”) filed a Notice of Appearance, Formal Complaint, and Public Statement.

On March 19, 2014, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance, Formal Complaint, and Public Statement.

On March 21, 2014, the Columbia Industrial Intervenors (“CII”) filed a Petition to Intervene.

On March 28, 2014, the Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

On April 23, 2014, the Commission entered an order instituting an investigation concerning Supplement No. 210. The Commission’s order also suspended Supplement No. 210 until October 28, 2014, and assigned the case to the Office of Administrative Law Judge.

On April 28, 2014, Administrative Law Judge (“ALJ”) Mark A. Hoyer issued a Prehearing Conference Order, which provided that an Initial Prehearing Conference is scheduled for May 9, 2014. Pursuant to the ALJ’s Prehearing Conference Order, Columbia submits this Prehearing Conference Memorandum.

II. SERVICE OF DOCUMENTS

Columbia requests that Michael W. Hassell and Devin T. Ryan be listed on the service list on behalf of Columbia. Their contact information is provided below:

Michael W. Hassell (ID # 34851)
Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
717-612-6052
Fax: 717-731-1985
Email: mhassell@postschell.com
dryan@postschell.com

Columbia also requests that Theodore J. Gallagher, Esquire, and Andrew S. Tubbs, Esquire, be added to any informal email distribution lists in this proceeding. Mr. Gallagher’s email address is tjgallagher@nisource.com, and Mr. Tubbs’s email address is astubbs@nisource.com.

III. WITNESSES AND ISSUES

Below are the witness and his area of testimony comprising Columbia's initial direct case in this proceeding. The subject matters listed below represent as complete a statement of issues that Columbia can provide at this stage of the proceeding. Further definition of contested issues by the parties will develop within the scope of the subject matters listed below during the course of the proceeding.

Columbia presently intends to offer the following witness to testify in the proceeding on the following subject matters:

<u>Statement Number</u>	<u>Witness</u>	<u>Subject Matter</u>
1	Erich Evans Director of Regulatory Strategy NiSource Corporate Services Company 200 Civic Center Drive Columbus, OH 43215	Background of Pilot Rider NAS; Eligibility for Pilot Rider NAS; Term of Pilot Rider NAS; Description of Pilot Rider NAS; Limits on Annual Deposits and Monthly Surcharges

The testimony fully supports Columbia's proposed Pilot Rider NAS under Supplement No. 210.

Columbia reserves the right to present testimony, sponsored either by the witness listed above or by further witnesses, as may be needed, regarding additional issues and subject matters that may arise during the course of the proceeding.

IV. DISCOVERY

Columbia does not propose any special orders regarding discovery. Columbia is not aware of any outstanding discovery disputes and has already received discovery requests from OCA and OSBA. Columbia is in the process of answering the interrogatories. Columbia is willing to work with the parties, through informal conferences, to expedite discovery.

V. PROCEDURAL SCHEDULE

Columbia proposes the following procedural schedule¹:

Prehearing Conference	May 9, 2014
Other Parties' Direct Testimony	June 10, 2014
Rebuttal Testimony	June 24, 2014
Surrebuttal Testimony	July 1, 2014
Rejoinder Testimony	July 7, 2014
Hearing	July 9, 2014
Main Brief	July 16, 2014
Reply Brief	July 23, 2014

VI. PUBLIC INPUT HEARINGS

Columbia is not aware of any substantial consumer interest with respect to the proposed Supplement No. 210. Columbia does not propose that any public input hearings be held absent substantial public interest in the filing.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

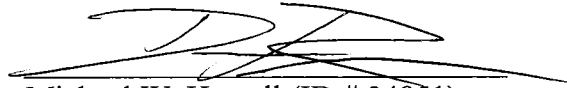
To the extent needed, Columbia will submit a Motion for Protective Order for consideration by the ALJ. Columbia will seek the concurrence of the other parties as to the form of the Protective Order before submitting the Motion.

VIII. SETTLEMENT DISCUSSIONS

To date, no settlement discussions have been held. However, Columbia will be working with the parties in an effort to resolve these proceedings through settlement.

¹ For parties accepting electronic service, the documents are to be served electronically on the date indicated, by 4:00 p.m. unless otherwise indicated. Hard copies will follow by first class mail or by express service. For parties not accepting electronic service and not located in Harrisburg, documents are due in hand on the following business day.

Respectfully submitted,



Theodore J. Gallagher (ID # 90842)
NiSource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA 15317
Phone: 724-416-6355
Fax: 724-416-6384
Email: tjgallagher@nisource.com

Michael W. Hassell (ID # 34851)
Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
Email: mhassell@postschell.com
Email: dryan@postschell.com

Andrew S. Tubbs (ID # 80310)
NiSource Corporate Services Company
800 North Third Street, Suite 402
Harrisburg, PA 17102
Phone: 717-238-0684
Email: astubbs@nisource.com

Date: May 7, 2014

Attorneys for Columbia Gas of Pennsylvania, Inc.