

100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166 Tel: 717.232.8000 • Fax: 717.237.5300 Elizabeth P. Trinkle Direct Dial: 717.237.5378 Direct Fax: 717.260.1759 etrinkle@mwn.com

March 30, 2014

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120 **VIA ELECTRONIC FILING**

RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc. Docket No. R-2015-2469665

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Petition to Intervene of the Columbia Industrial Intervenors ("CII"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served.

Very truly yours,

McNEES WALLACE & NURICK LLC

By

Elezabeth P. Trinkle

Counsel to Columbia Industrial Intervenors

/emp

Enclosure

c: 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).

VIA E-MAIL AND FIRST-CLASS MAIL

Michael W. Hassell, Esq. Lindsay A. Berkstresser, Esq. Post & Schell PC 17 North Second Street Harrisburg, PA 17101-1601 mhassell@postschell.com lberkstresser@postschell.com

Andrew S. Tubbs, Esq.
NiSource Corporate Services Company
800 North Third Street, Suite 204
Harrisburg, PA 17102
astubbs@nisource.com

Nancy Krajovic
Theodore J. Gallagher, Esq.
Nisource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA 15317
nkrajovic@nisource.com
tjgallagher@nisource.com

Scott B. Granger, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Tanya J. McCloskey, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
tmccloskey@paoca.org

John R. Evans
Office of Small Business Advocate
Suite 202, Commerce Building
300 North Second Street
Harrisburg, PA 17101
jorevan@pa.gov

Todd S. Stewart, Esq.
Hawke McKeon Sniscak LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105
tsstewart@hmslegal.com

Elizabeth P. Trinkle

Counsel to the Columbia Industrial Intervenors

Dated this 30th day of March, 2015, at Harrisburg, Pennsylvania.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

:

PENNSYLVANIA PUBLIC UTILITY COMMISSION

SION

Docket No. R-2015-2469665

COLUMBIA GAS OF PENNSYLVANIA,

INC.

v.

PETITION TO INTERVENE OF THE COLUMBIA INDUSTRIAL INTERVENORS

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the Columbia Industrial Intervenors ("CII") hereby file this Petition to Intervene in the above-captioned proceeding. In support thereof, CII asserts as follows:

- 1. For purposes of this proceeding, CII includes the companies listed in Appendix A hereto. CII will update Appendix A during the course of this proceeding as needed to reflect changes in its membership.
 - 2. The names and address of CII's attorneys are:

Charis Mincavage (Pa. I.D. No. 82039) Elizabeth P. Trinkle (Pa. I.D. No. 313763) McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 Phone: (717) 232-8000

Fax: (717) 237-5300 cmincavage@mwn.com etrinkle@mwn.com

- 3. On February 27, 2015, Columbia Gas of Pennsylvania, Inc. ("Columbia" or "Company") made its preliminary Purchase Gas Cost ("PGC") filing with the Commission pursuant to Section 1307(f) of the Public Utility Code. *See* 66 Pa. C.S. § 1307(f). Columbia's filing indicates that the Company will submit its annual PGC filing on April 1, 2015.
- 4. CII is an <u>ad hoc</u> group of energy-intensive customers receiving service from Columbia under both sales and transportation rate schedules, including Rate LDS (Large Distribution Service) and Rate LGSS (Large General Sales Service). CII members use substantial volumes of natural gas in their manufacturing and operational processes, and natural gas costs comprise a significant element of their respective costs of operation. The PUC's disposition of Columbia's 1307(f) filing may impact the rates CII members pay for natural gas service.
- 5. Columbia proposes a decrease of \$0.14050/therm to its PGC rate, from \$0.53891/therm to \$0.39841/therm, applicable to customers served under Rate RSS (Residential Sales Service), Rate RDGSS (Residential Distributed General Sales Service), Rate SGSS (Small General Sales Service), Rate LGSS, and Rate MLSS (Main Line Sales Service). Accordingly, the Commission's resolution of these issues may impact the sales rates applicable to CII members.
- 6. Therefore, consistent with 52 Pa. Code § 5.72(a), CII has a significant interest in this proceeding that is not represented by any other party of record. Consequently, CII should be granted intervenor status in this proceeding.

WHEREFORE, for the reasons stated above, the Columbia Industrial Intervenors respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the Columbia Industrial Intervenors with full-party status in this

proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By _

Charis Mincavage (Pa. I.D. No. 82039)

Elizabeth P. Trinkle (Pa. I.D. No. 313763)

100 Pine Street

P. O. Box 1166

Harrisburg, PA 17108-1166

Phone: (717) 232-8000 Fax: (717) 237-5300 cmincavage@mwn.com

etrinkle@mwn.com

Counsel to the Columbia Industrial Intervenors

Dated: March 30, 2015

3

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
) ss
COUNTY OF DAUPHIN)

Elizabeth P. Trinkle, being duly sworn according to law, deposes and says that she is Counsel to the Columbia Industrial Intervenors, and that in this capacity she is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition are true and correct to the best of her knowledge, information and belief.

Elizabeth P. Trinkle

SWORN TO and subscribed before me this 30th day of March, 2015.

COMMONWEALTH OF PENNSYLVANIA

Mary A. Sipe, Notary Public
City of Harrisburg, Dauphin County
My Commission Explires March 19, 201

(SEAL)

APPENDIX A

COLUMBIA INDUSTRIAL INTERVENORS

Glen-Gery Corporation

Knouse Foods Cooperative, Inc.