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April 6, 2015

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> 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 Prehearing Memorandum 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   
Elizabeth P. Trinkle

Counsel to Columbia Industrial Intervenors

/lmc

Enclosure

c: Administrative Law Judge Mark A. Hoyer (via E-Mail and First-Class Mail)  
Certificate of Service

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## 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

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Elizabeth P. Trinkle

Counsel to the Columbia Industrial Intervenors

Dated this 6<sup>th</sup> day of April, 2015, at Harrisburg, Pennsylvania.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket No. R-2015-2469665
	:	
	:	
v.	:	
	:	
COLUMBIA GAS OF PENNSYLVANIA, INC.	:	
	:	

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**PREHEARING MEMORANDUM OF  
COLUMBIA INDUSTRIAL INTERVENORS**

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Pursuant to Administrative Law Judge ("ALJ") Mark A. Hoyer's April 1, 2015, Prehearing Conference Order, Columbia Industrial Intervenors ("CII") hereby submit this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On February 27, 2015, Columbia Gas of Pennsylvania, Inc. ("Columbia" or "Company"), submitted its preliminary Purchased Gas Cost ("PGC") filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") pursuant to the requirements of Section 1307(f) of the Public Utility Code. On April 1, 2015, Columbia filed supplemental testimony setting forth the proposed gas recovery rates effective for service rendered on or after October 1, 2015.

On March 30, 2015, CII filed a Petition to Intervene in this proceeding. A description of CII is set forth in Paragraph 4 of CII's Petition to Intervene. CII's Petition to Intervene is pending and awaits disposition by the ALJ.

## **II. SERVICE LIST**

For purposes of this proceeding, CII will be represented by the following counsel:

Charis Mincavage (Pa. I.D. 82039)  
Elizabeth P. Trinkle (Pa. I.D. 313763)  
McNees Wallace & Nurick LLC  
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Please direct all correspondence to the attention of Charis Mincavage; however, for purposes of electronic service lists, CII requests that both Ms. Mincavage and Ms. Trinkle be included on any correspondence.

## **III. ANTICIPATED ISSUES AND SUB-ISSUES**

Because any changes to the Company's gas costs may affect its members, CII is concerned with any modifications to the PGC proposed in this proceeding. Similarly, CII is concerned with any issues that may arise regarding interruptible transportation service, pipeline capacity cost assignment, penalty charges, and daily and monthly imbalance penalties. CII anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all matters raised by other parties.

## **IV. PROPOSED WITNESSES**

CII is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that CII decides to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and topics of testimony. CII also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

**V. PROPOSED SCHEDULE AND DISCOVERY RULES**

CII will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

**VI. POSSIBILITY OF SETTLEMENT**

CII is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to Columbia Industrial Intervenors

Dated: April 6, 2015