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April 6, 2015

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. Columbia Gas of Pennsylvania; Docket No. R-2015-2469665; PREHEARING CONFERENCE MEMORANDUM OF SHIPLEY CHOICE, LLC, INTERSTATE GAS SUPPLY, INC AND DOMINION RETAIL, INC.

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of Shipley Choice, LLC, Interstate Gas Supply, Inc., and Dominion Retail, Inc. ("NGS Parties") in the above-captioned docket. Copies of this Petition 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 Shipley Choice, LLC Interstate Gas Supply, Inc. and Dominion Retail, Inc.

TSS/das Enclosure

cc: Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et

al.,

:

v. :

Docket No. R-2015-2469665

Columbia Gas of Pennsylvania, Inc.

PREHEARING CONFERENCE MEMORANDUM OF SHIPLEY CHOICE, LLC, INTERSTATE GAS SUPPLY, INC. AND DOMINION RETAIL, INC.

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TO THE HONORABLE MARK A. HOYER:

Pursuant to the Prehearing Order dated April 1, 2015 in the above-captioned matter and the Commission's regulations at 52 Pa. Code §5.221, et seq., Shipley Choice, LLC d/b/a Shipley Energy Company ("Shipley"), Interstate Gas Supply, Inc. d/b/a IGS Energy ("IGS") and Dominion Retail, Inc. d/b/a Dominion Energy Solutions ("DES")(collectively "NGS Parties"), hereby submit their Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On or about February 27, 2015, Columba Gas of Pennsylvania, Inc. ("Columbia" or "Company") filed its annual reconciliation pre-filing under Section 1307(f) of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1307(f). On or about April 1, 2015, Columbia served the testimony to accompany the pre-filing information.

2. On February 26, 2015, the NGS Parties petitioned to intervene in the above-captioned proceeding.

II. EXPECTED ISSUES

3. As discussed in the NGS Parties' Petition to Intervene, the NGS Parties continue to review the filing and have not yet identified all the specific issues of concern. The NGS Parties have identified their primary issue in this case, which will be the universal sharing mechanism employed by Columbia to distribute the proceeds from off-system sales. Beyond that, the NGS Parties will seek to ensure that Columbia's filing and related tariffs and procedures do not negatively impact the competitive natural gas market.

III. PROPOSED WITNESSES

4. The NGS Parties currently propose to introduce the testimony of Matt S. White of Interstate Gas Supply, Inc.. If the witness changes, or if they intend to present additional witnesses, the NGS Parties will notify Your Honor and the parties at the earliest possible date.

IV. LITIGATION SCHEDULE

5. The NGS Parties understand that a litigation schedule has been proposed by Columbia, and have no objection to the proposed dates. The NGS Parties offer one caveat, however, that their witness may be unavailable on June 4, 2015. The NGS Parties request, that if hearings are indeed scheduled for June 3 and 4 that their witness be scheduled on June 3. The NGS Parties would be amenable to shifting the hearing dates to June 2 and 3 and understand that the Company would be able to accommodate this adjustment. We will not suggest adjusting any other dates on the hearing schedule proposed by the Company but are willing to discuss any further changes.

V. DISCOVERY

> 6. The NGS Parties have not yet submitted discovery as of the date of this

prehearing memorandum but do intend to do so shortly. The NGS Parties will work

cooperatively with the Company and all the other parties in order to minimize discovery issues

that might require the attention of the Presiding Administrative Law Judge. Moreover, the NGS

Parties would not object to the typical discovery modifications proposed by the Office of

Consumer Advocate in cases such as this.

VI. **SETTLEMENT**

> 7. The NGS Parties are willing to engage in settlement discussions with any and all

party at any time during this proceeding and welcome the opportunity to do so at the earliest

possible date.

WHEREFORE, the NGS Parties respectfully submit this Prehearing Conference

Memorandum in anticipation of the Prehearing Conference currently scheduled for Tuesday,

April 7, 2015 at 2:00 PM.

Respectfully submitted,

Todd S. Stewart

PA Attorney I.D. #75556

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Counsel for

Shipley Choice, LLC Interstate Gas Supply, Inc.

and Dominion Retail, Inc. ("NGS Parties")

DATED: April 6, 2015

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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

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DATED: April 6, 2015

Todd S. Stewart