

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No.: R-2015-2468056
	:	
Columbia Gas of Pennsylvania, Inc.	:	

Prehearing Memorandum

On April 9, 2015 a Prehearing Conference Order was issued by the Pennsylvania Public Utility Commission (“Commission”) setting a prehearing conference for April 16, 2015, at 10:00 am before the Honorable Mary D. Long, Administrative Law Judge. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On March 18, 2015, Columbia Gas of Pennsylvania (“Columbia”) submitted a rate filing, Supplement No. 226 to its Tariff Gas PA PUC No. 9, which proposes to increase rates by approximately \$46.2 million per year, or 8.63%. According to Columbia’s calculations, its proposal would increase the total bill for an average residential customer from \$90.04 to \$97.82 per month. On April 8, 2015, CAUSE-PA filed a Petition to Intervene. On April 9, 2014, the Commission entered an order suspending the implementation of Supplement No. 226 by operation of law until December 18, 2015, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in the proposed Supplement No. 226.

II. Issues to be Presented

In addition to complying with sound rate making principles, including the requirement that rates be just and reasonable, Columbia Gas of Pennsylvania, Inc. (“Columbia”) must also ensure that its rates and tariff comply with universal service requirements. In turn, the Commission must ensure that universal service programs assist low-income customers to afford natural gas service, and that these programs are appropriately funded and available in each natural gas distribution territory. 66 Pa. C.S. § 2203(8).

In the event that the Commission approves any natural gas distribution rate increase, the Commission should condition approval on Columbia’s agreement to perform such actions as are necessary to assure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of Columbia’s proposed tariff changes and testimony, and it opposes Columbia’s request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. The following specific issues of concern must be addressed in this proceeding:

- i. The conformity to law and the effect of Columbia’s rate filing and proposed rate increase on low and lower income households; and,
- ii. The conformity to law, adequacy and effect on low income households enrolled in Columbia’s current Universal Service Programs.

III. Witnesses and Testimony

CAUSE-PA reserves the right to present the following witness to testify in this matter, as well as the right to call additional witnesses as may be warranted upon proper notice to Your Honors and the parties:

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

CAUSE-PA will work with the other parties to come to a schedule which suits the needs of all parties and the Commission. CAUSE-PA supports the submission of the testimony of witnesses in writing in advance of the hearing.

V. Public Input Hearings

CAUSE-PA does not oppose the scheduling of public input hearings, but is not presently requesting that any be scheduled.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

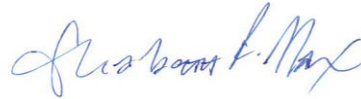
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WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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April 10, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2015-2406274
	:	
Columbia Gas of Pennsylvania, Inc.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Respectfully submitted,

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Date: April 10, 2015