

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

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consumer@paoca.org

April 13, 2015

Michael W. Hassell, Esq.  
Jessica Rogers, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Fl.  
Harrisburg, PA 17101

RE: Pennsylvania Public Utility Commission  
v.  
Columbia Gas of Pennsylvania, Inc.  
1307(f) Proceeding  
Docket No. R-2015-2469665

Dear Mr. Hassell & Ms. Berkstresser:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set II, in the above-referenced proceeding.

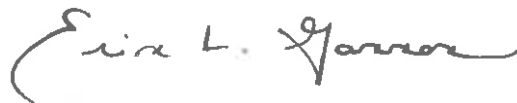
We request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Melissa Whitten  
LaCapra Associates, Inc.  
One Washington Mall, 9<sup>th</sup> Floor  
Boston, MA 02108

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully Submitted,

A handwritten signature in black ink that reads "Erin L. Gannon". The signature is written in a cursive style with a large, sweeping initial "E".

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: EGannon@paoca.org

Enclosures

cc: All parties of record  
Rosemary Chiavetta (Certificate of Service)

\*202777

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2015-2469665  
 :  
 Columbia Gas of Pennsylvania, Inc. :  
 1307(f) Proceeding :

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INTERROGATORIES OF THE  
OFFICE OF CONSUMER ADVOCATE  
SET II

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Pursuant to 52 Pa. Code § 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to Columbia Gas of Pennsylvania, Inc. to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code §5.342(a)(6).

DATED: April 13, 2015

## Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "Columbia Gas of Pennsylvania" or "the Company," or "you," as used herein includes Columbia Gas of Pennsylvania, Inc., its attorneys, agents, employees, contractors, or other representatives to the extent that the Company has the right to compel the action requested therein.
- 6) Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witness' knowledge, information and belief.
- 7) As used herein, but only to the extent not protected by 52 Pa. Code Section 5.323, the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
  - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
  - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
  - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

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Interrogatories of the  
Office of Consumer Advocate  
Set II

Please prepare responses to the Interrogatories that follow in the requested format:

For all responses generated using Excel or electronic spreadsheets please provide along with the response a copy of the response in electronic spreadsheet format with all cells enabled and cell formulas intact; and

For all responses generated using a word processing file or submitted in pdf format, please provide the response in an electronically searchable version of the pdf file.

SUPPLY

1. Reference Exhibit No. 8-C. The Company states that when contracting for transportation and storage capacity, it considers various factors (i.e. price, term of contract, flexibility and reliability), but ultimately uses the delivery point into the system as the determining factor.
  - a. Compared to the prior year's PGC Application Period, has the Company relinquished any suppliers from their contracts with the Company? If so, please explain which suppliers and why.
  - b. Compared to the prior year's PGC Application Period, has the Company made any supply changes or expect any demand changes that would impact the gathering lines ability to bring gas into the system? If so, please explain the changes and describe their inclusion in base rates.

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- c. Compared to the prior year's PGC Application Period, how has the use of local production, as a source of capacity, been utilized by the Company?
  
2. Reference Exhibit No. 8-B. The Company describes the communities it serves as being in separate market areas, which leads to the distribution network being limited to mains and services located downstream from city gate delivery points of each area. Although the Company has limited ability to move gas around these areas, the pipeline network of Columbia Gas Transmission LLC interconnects with the majority of the Company's market areas, allowing flexible service that could not be duplicated without significant capital expenditures.
  - a. Explain the impact the delivery points have on the use of local production versus contracting with suppliers outside of Pennsylvania.
  - b. Does the Company have segmented lines between the suppliers and market area delivery points?
  - c. Explain the Company's pipeline network with its different market areas, including the "significant capital expenditures" that would be needed to duplicate the flexible service by the current pipeline network.

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission : Docket Nos. R-2015-2469665  
: C-2015-2474515  
v. :  
: :  
Columbia Gas of Pennsylvania, Inc. :  
1307(f) Proceeding :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate’s Interrogatories Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 13th day of April 2015.

SERVICE BY INTER-OFFICE MAIL

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, P.O. Box 3265  
Harrisburg, PA 17105-3265

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Michael W. Hassell, Esq.  
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Harrisburg, PA 17101

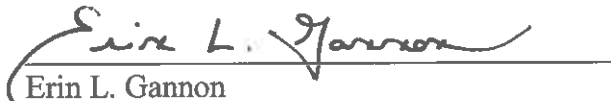
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Office of Small Business Advocate  
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Harrisburg, PA 17101

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NisSource Corporate Service Company  
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Harrisburg, PA 17102

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Nancy Krajovic  
121 Champion Way, Suite 100  
Canonsburg, PA 15317

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P.O. Box 1778  
100 n. Tenth Street  
Harrisburg, PA 17105-1779

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



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