



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

April 15, 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 Nos. R-2015-2468056 and C-2015-2473682;
**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. in the above-captioned dockets. Copies of this Memorandum 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.
("NGS Parties")*

TSS/jld
Enclosure
cc: Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

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

Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, PO Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

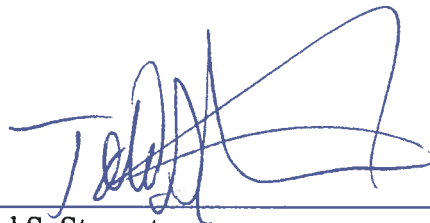
Daniel G. Asmus, Esquire
Small Business Advocate
Office of Small Business Advocate
300 North Second Street
Suite 1102
Harrisburg, PA 17101
dasmus@pa.gov

Erin L. Gannon, Esquire
Candis A. Tunilo, Esquire
Hobart J. Webster, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
EGannon@paoca.org
ctunilo@paoca.org
hwebster@paoca.org

Charis Mincavage, Esquire
Elizabeth P. Trinkle, Esquire
McNees, Wallace & Nurick, LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com
etrinkle@mwn.com

Michael W. Hassell, Esquire
Michael W. Gang, Esquire
Jessica R. Rogers, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Fl.
Harrisburg, PA 17101-1601
mhassell@postschell.com
mgang@postschell.com
jrogers@postschell.com

Patrick M. Cicero, Esquire
Harry S. Geller, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net



Todd S. Stewart

DATED: April 15, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
et al.,	:	
	:	Docket Nos.: R-2015-2468056
v.	:	C-2015-2473682
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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

TO THE HONORABLE MARY D. LONG:

Pursuant to the Prehearing Order dated April 9, 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 March 19, 2015, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”) filed a Supplement No. 221 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 226”) seeking to increase operating revenues by approximately \$46.2 million, or approximately 8.63%. By Order date April 9, 2015, the Pennsylvania Public Utility Commission (“Commission”) suspended the effective date of the tariff until December 18, 2015.

2. On March 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 have identified a number of issues of concern, including the proposed modifications to the gas procurement charge ("GPC") and the imposition of a CHOICE administration charge ("CAC"). The NGS Parties also have identified a number of process and procedure issues concerning OFO's and OMO's and associated penalties during extreme weather events as well as other process issues. The NGS Parties continue to review the filing and reserve the right to raise any additional issues in Direct or at other appropriate stages of the proceeding.

III. PROPOSED WITNESSES

4. The NGS Parties intend to present the testimony of three witnesses to address the issues identified above. Matt White, General Counsel for IGS, will address the GPC and CAC issues; Thomas Butler, Director, Retail Gas Sales & Supply for DES, will address the OFO/OMO and penalty issues and Matthew Sommer, President of Shipley Group, will address the other operational/process issues. The NGS Parties reserve the right to offer additional witnesses as necessitated by the issues.

IV. LITIGATION SCHEDULE

5. The NGS Parties have been following with interest the progress of discussions regarding a litigation schedule, and have no current objection to the proposed schedule. The NGS Parties will work with the other parties and Your Honor to develop a schedule that meets all the parties' needs.

V. DISCOVERY

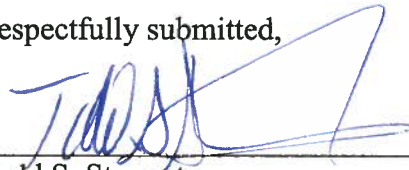
6. The NGS Parties have submitted discovery as of the date of this prehearing memorandum and will continue to do so as needed. The NGS Parties will work cooperatively with the Company and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative 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 parties 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 Thursday, April 16, 2015 at 10:00 AM.

Respectfully submitted,



Todd S. Stewart
PA Attorney I.D. #75556
Hawke McKeon & Sniscak LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
E-mail: tsstewart@hmslegal.com
Telephone: (717) 236-1300
Facsimile: (717) 236-4841

Counsel for Shipley Choice, LLC, Interstate Gas Supply, Inc. and Dominion Retail, Inc. ("NGS Parties")

DATED: April 15, 2015