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July 31, 2015

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17120

Re: PA Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.; Docket  
No. R-2015-2468056; **MOTION FOR LEAVE TO FILE AMENDED  
COMPLAINT OF THE PENNSYLVANIA STATE UNIVERSITY**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Motion for Leave to File Amended Complaint of The Pennsylvania State University in connection with the above-captioned docket. Copies of this document have been served in accordance with the attached Certificate of Service.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,

Thomas J. Sniscak  
Christopher M. Arfaa  
William E. Lehman

*Counsel for  
The Pennsylvania State University.*

TJS/CMA/das  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2015-2468056
	:	
Columbia Gas of Pennsylvania, Inc.	:	
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Office of Consumer Advocate	:	
	:	
v.	:	Docket No. C-2015-2473682
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Columbia Gas of Pennsylvania, Inc.	:	
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Office of Small Business Advocate	:	
	:	
v.	:	Docket No. C-2015-2477816
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Columbia Gas of Pennsylvania, Inc.	:	
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Columbia Industrial Intervenors	:	
	:	
v.	:	Docket No. C-2015-2477120
	:	
Columbia Gas of Pennsylvania, Inc.	:	
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Pennsylvania State University	:	
	:	
v.	:	Docket No. C-2015-2476623
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**NOTICE TO PLEAD**

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TO: Michael W. Hassell, Esquire  
Lindsay A. Berkstresser, Esquire  
Post & Schell, P.C.  
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12<sup>th</sup> Floor  
Harrisburg, PA 17101

Theodore J. Gallagher, Esquire  
Columbia Gas of Pennsylvania, Inc.  
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Andrew S. Tubbs, Esquire  
NiSource Corporate Services Company  
800 N. Third Street, Suite 204  
Harrisburg, PA 17102

*Counsel for Columbia Gas of Pennsylvania, Inc.*

Pursuant to 52 Pa. Code §§5.102(a), you are hereby notified that The Pennsylvania State University ("PSU") has filed a Motion for Leave to File Amended Complaint in the above-captioned proceeding to which you may file an Answer within ten (10) days unless otherwise provided in Title 52 of the Pennsylvania Code. All Pleadings such as any Answer to this Motion must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for The Pennsylvania State University.

  
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*Counsel for The Pennsylvania State University*

DATED: July 31, 2015

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT OF  
THE PENNSYLVANIA STATE UNIVERSITY**

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Pursuant to 52 Pa. Code §§ 5.91-9.92, The Pennsylvania State University (“Penn State” or “PSU”), by and through its undersigned counsel, Hawke McKeon & Sniscak LLP, hereby moves for leave to file the attached Amended Complaint in the above-captioned matter, and in support of its motion states as follows:

## **I. BACKGROUND**

1. On March 19, 2015, CPA filed Supplement No. 226 to Tariff Gas Pa. P.U.C. No. 9 to become effective May 18, 2015, containing proposed changes in rates, rules, and regulations calculated to produce \$46.2 million (8.63%) in additional annual revenues. On April 9, 2015, the Commission issued an Order suspending CPA's filing until December 18, 2015, unless permitted by Commission Order to become effective at an earlier date. On April 10, 2015, PSU filed a Complaint against the rate filing which was docketed at C-2015-2476623.

2. The State College area is presently served by CPA via three (3) Points of Delivery ("PODs") owned by CPA: the Snowshoe POD; the Dominion Transmission ("DTI") POD at Pleasant Gap; and the Texas Eastern Transmission ("TETCO") POD.

3. Subsequent to the Company's rate filing on March 19, 2015 and PSU's Complaint filing on April 10, 2015, CPA issued a letter dated May 5, 2015, notifying PSU that effective July 1, 2016, CPA would be permanently removing the distribution line from the Snowshoe POD from service because certain parts of the line need replaced. This action issue presents new rate base, O&M, service and reliability and other rate case issues.

4. On March 19, 2015, CPA filed Supplement No. 226 to Tariff Gas Pa. P.U.C. No. 9 to become effective May 18, 2015, containing proposed changes in rates, rules, and regulations calculated to produce \$46.2 million (8.63%) in additional annual revenues. On April 9, 2015, the Commission issued an Order suspending CPA's filing until December 18, 2015, unless permitted by Commission Order to become effective at an earlier date. On April 10, 2015, PSU filed a Complaint against the rate filing which was docketed at C-2015-2476623.

5. The State College area is presently served by CPA via three (3) Points of Delivery (“PODs”) owned by CPA: the Snowshoe/CPG POD; the Dominion Transmission (“DTI”) POD at Pleasant Gap; and the Texas Eastern Transmission (“TETCO”) POD.

6. Subsequent to the Company’s rate filing on March 19, 2015 and PSU’s Complaint filing on April 10, 2015, CPA issued a letter dated May 5, 2015, notifying PSU that effective July 1, 2016, CPA would be permanently removing the distribution line from the Snowshoe/Columbia Gas Transmission (“CPG”) POD from service because certain parts of the line need replaced. That issue presents new rate base, O&M, service and reliability and other rate case issues.

7. PSU was prepared to issue formal discovery on the subject on May 19, 2015, but at CPA’s request, the parties agreed to have discussions regarding these issues. On May 28, 2015, the informal discussion did not (from PSU’s perspective) result in either any sufficiently detailed information being provided promptly or any resolution of the issue. Consequently, on June 3, 2015, PSU filed its Set I discovery on CPA. Pursuant to the Scheduling Order issued in this proceeding, Oral Objections were due to PSU by June 6 and written Objections were due by June 8, 2015. No objections, either oral or written, were received from CPA. Thus, CPA’s responses to PSU’s Set I were due by June 15, 2015.

8. Pursuant to the Scheduling Order, PSU’s direct testimony was due on or before June 19, 2015. Since PSU had not received responses to its discovery requests regarding the Snowshoe Lateral by that date, PSU filed a motion for discovery sanctions requesting that CPA be compelled to provide the missing discovery responses and that PSU be permitted to file supplemental direct testimony on the matters to which the discovery requests were directed.

9. PSU and CPA negotiated a resolution to the discovery dispute pursuant to which CPA would provide complete responses to the outstanding requests, PSU would file supplemental direct, and CPA would have extra time, if necessary, to file supplemental rebuttal to PSU's supplemental direct. The resolution was adopted by the Presiding Officer in an Interim Order issued July 2, 2015.

10. CPA eventually provided responsive answers and documents to PSU's discovery requests. In addition to providing information regarding the timing and motivation of CPA's decision to remove the Snowshoe Lateral, CPA's responses revealed for the first time that CPA had deliberately delayed notifying PSU and other customers and marketers of its decision until after CPA had bought up all firm transportation capacity on the DTI line for shipment of gas to the DTI POD.

11. On July 8, 2015, pursuant to the July 2, 2015 Interim Order, PSU filed the Supplemental Direct testimony of James Crist, which addressed the rate issues raised by CPA's decision to remove the Snowshoe Lateral, its buying up of DTI pipeline capacity,

12. On July 16, 2015, pursuant to the Scheduling Order, CPA filed its rebuttal testimony. CPA witnesses Anderson, Paloney and Kempic each responded to the PSU witness Crist's Supplemental Direct Testimony regarding the issues raised by the removal of the Snowshoe Lateral and the buying-up of the DTI transmission. On July 24, 2015, CPA witness Krajovic submitted "supplemental rebuttal" testimony responding to these issues. In total, CPA submitted 69 pages of written rebuttal testimony (not including exhibits) in response to Mr. Crist's direct and supplemental direct testimony regarding the removal of the Snowshoe Lateral and the purchase of DTI capacity.

13. During a conference call with CPA and PSU counsel on July 15, 2015, the Presiding Officer noted that PSU's complaint did not challenge CPA's removal of the Snowshoe Lateral or its buying-up of the DTI capacity. Counsel for PSU explained that this was because (a) CPA had not disclosed its plan to remove the Snowshoe Lateral until May 5, 2015, and (b) CPA had not completed its purchase of the DTI capacity until just before that date. The Presiding Officer then pointed out that PSU had not amended its complaint.

**II. PSU SHOULD BE PERMITTED TO AMEND ITS COMPLAINT TO CONFORM TO THE ISSUES WHICH PSU INTENDS TO INTRODUCE AT THE HEARINGS IN THIS MATTER**

14. When PSU filed its complaint on April 10, 2015, CPA was still in the process of buying up capacity on the DTI pipeline and had not informed PSU or any other customer of its decision to abandon the Snowshoe Lateral. Therefore, PSU's complaint does not contain allegations relating to those matters or the rate issues PSU contends they raise. CPA notified PSU of its decision to abandon the Snowshoe Lateral on May 5, 2015, but the facts underlying that decision and the related decision to withhold notice to customers until CPA had completed its purchase of DTI capacity did not come to light until CPA answered and produced documents in response to PSU's discovery requests. PSU's witnesses have raised these matters and the associated rate issues in their prefiled written testimonies, and CPA's witnesses have addressed them in their prefiled, written rebuttal and surrebuttal testimonies. PSU therefore respectfully requests leave to amend its complaint in order to conform it to the issues that that PSU intends to introduce at hearing.

15. Section 5.92 of the Commission's Rules of Practice and Procedure, which governs amendments to conform to the evidence, provides as follows:

(a) *Amendment by consent.* When the parties introduce issues at a hearing not raised by the pleadings whether by express or implied consent of the parties, the issues shall be treated in all respects as if they had been raised in the pleadings.

(b) *Amendments by motion.* Amendments of the pleadings as may be necessary to cause them to conform to the evidence and to raise new issues may be made upon motion of a party at any time during the hearing as set forth in § 5.102 (relating to motions for summary judgment and judgment on the pleadings).

(c) *Amendment following objection.* If evidence upon new issues is objected to on the ground that it is not within the issues raised by the pleadings, the Commission or the presiding officer may allow the pleadings to be amended and the evidence to be received, when it appears that the presentation of the merits of the proceedings will be served thereby without prejudicing the public interest or the rights of a party.

(d) *Continuance following objection.* A continuance may be granted by the Commission or the presiding officer under § 1.15 (relating to extensions of time and continuances) when necessary to allow the objecting party to address new issues and evidence.

(e) *Notice of amendment.* If an amendment adopted under this section has the effect of broadening the issues in the proceeding, notice of the amendment shall be given in the same manner as notice was given at the commencement of the proceeding and to the same persons who received the notice.<sup>1</sup>

16. PSU is aware that, due to the expedited nature of rate proceedings, the Commission's custom and practice in such cases is to treat the pleadings as having been amended by implied consent to conform to the issues introduced at the hearings, as provided in 52 Pa. Code § 5.92(a), rather than requiring motions. However, PSU has determined that seeking leave to amend by motion is the prudent course in view of the Presiding Officer's expressed concern regarding the lack of reference in PSU's complaint to the issues raised by CPA's decision to remove of the Snowshoe Lateral and buy up the DTI capacity.

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<sup>1</sup> 52 Pa. Code § 5.92.

17. PSU submits that good cause exists to grant leave to amend its complaint. PSU did not know, and could not have known, of the issues raised by CPA's decision to remove of the Snowshoe Lateral and buy up the DTI capacity before it filed its complaint because those events had not yet occurred. Furthermore, the proffered amendment will not prejudice CPA (or any other party). CPA and the other parties have had notice of these new issues and PSU's general positions on them since service of PSU's prefiled, written direct testimony on June 19, 2015. Since then, CPA has propounded and received PSU's responses to four sets of discovery requests regarding PSU's contentions; it has prefiled 69 pages of written rebuttal and surrebuttal testimonies addressing the issues; and it has advised PSU that it will be filing additional rejoinder testimony on the subject. All issues addressed by CPA cover the issues in the amendment which essentially conforms the pleading to the prefiled testimony and information learned in on-going discovery.

### **III. CONCLUSION**

Wherefore, for all of the foregoing reasons, PSU respectfully requests that the Presiding Officer grant this motion and enter an order granting PSU leave to amend its complaint by filing the Proposed Amended Complaint.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Columbia Gas of Pennsylvania, Inc.	:	
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v.	:	Docket No. C-2015-2473682
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Office of Small Business Advocate	:	
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v.	:	Docket No. C-2015-2477816
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Columbia Industrial Intervenors	:	
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v.	:	Docket No. C-2015-2477120
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Columbia Gas of Pennsylvania, Inc.	:	
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Pennsylvania State University	:	
	:	
v.	:	Docket No. C-2015-2476623
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**AMENDED COMPLAINT OF THE PENNSYLVANIA STATE UNIVERSITY**

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Pursuant to Chapters 7 and 13 of the Public Utility Code, 66 Pa.C.S. §§ 701 and 1301 *et seq.*, and Sections 5.21, 5.22 & 5.32 of the Pennsylvania Public Utility Commission’s (“Commission”) Regulations, 52 Pa. Code §§ 5.21, 5.22 & 5.32, The Pennsylvania State

University (“PSU”) hereby submits this Amended Complaint against the above-captioned 2015 base rate general rate increase filing pursuant to 66 Pa.C.S. §1308(d) of Columbia Gas of Pennsylvania, Inc. (“Columbia Gas” or “Company”). In support of its Formal Complaint, PSU states as follows:

1. The Complainant, PSU, is the Commonwealth’s Land Grant University with its business addresses for purposes of this proceeding located at:

Office of Physical Plant  
The Pennsylvania State University  
Room 208 Physical Plant Building  
University Park, PA 16802-1118  
Attn: Robert E. Cooper, P.E.  
Director, Energy and Engineering

18. The names and address of counsel for PSU are:

Thomas J. Sniscak, Attorney I.D. No. 33891  
William E. Lehman, Attorney I.D. No. 83936  
Hawke McKeon & Sniscak, LLP  
100 N. 10<sup>th</sup> Street  
P.O. Box 1778  
Harrisburg, PA 17105-1778  
Telephone: (717) 236-1300  
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tjsniscak@hmslegal.com  
welehman@hmslegal.com

All correspondence in this proceeding from the Commission should be directed to the attention of Counsel at the address listed above.

19. The Respondent Utility is:

Columbia Gas of Pennsylvania, Inc.  
Southpoint Industrial Park  
121 Champion Way, Suite 100  
Canonsburg, PA 15317

20. On March 19, 2015, Columbia Gas filed Supplement No. 211 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 226”). Supplement No. 226 proposes to increase rates to

produce annual operating revenues of \$46.2 million, which is an increase of 8.63% over present revenues. Columbia Gas proposed that the rate increase become effective on May 18, 2015; however, by Order dated April 9, 2015, the Commission suspended the effective date until December 18, 2015.

21. PSU is a major customer of Columbia Gas for natural gas service for a number of separate accounts under the following tariff rate classifications: LDS (Large Distribution Service); SDS (Small Distribution Service); SGSS (Small General Sales Service); and RSS (Residential Sales Service). As a major customer, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby.

22. Pursuant to Section 315(a) of the Public Utility Code, 66 Pa.C.S. §315(a), Columbia Gas is the party with the burden to show its proposed rates are just and reasonable and that the proposed rates otherwise comply with the Public Utility Code, 66 Pa.C.S. §§ 1301 *et seq.*

23. Based upon its preliminary review of the filing, which is ongoing, PSU believes the rates, terms and provisions contained in the above-referenced tariff filing appear to be unjust, unreasonable and discriminatory and may allocate the Company's proposed rate increase between customers in an unjust, unreasonable and discriminatory fashion.

24. Contrary to Commission policy to encourage competition and develop a healthy alternative gas supply market, the Company has again introduced Rider CAC, "Choice Administration Charge," an additional fee that applies to all customers receiving gas supplies from an alternative provider and places Columbia's own system supply gas in a more favorable position. In addition, the Company's proposed Gas Procurement Charge is notably lower than other Pennsylvania natural gas distribution companies and also serves to place Columbia's own system supply gas in a more favorable position.

25. The Company's cost allocations and multiple Cost of Service Studies appear to be unreasonable and discriminatory as is the proposed distribution of its recommended revenue requirement.

26. Centre County is served by three interstate pipelines: Columbia Pipeline Groups' TCO 1711 pipeline, a Dominion Transmission Inc. ("DTI") pipeline, and a Texas Eastern ("TETCO") pipeline. The three pipelines deliver gas at three separate points of presence ("PODs"): the Snowshoe POD, the DTI POD and the TETCO POD, respectively.

27. Historically, most of the gas supplied by the Company to the State College area has flowed from the TCO 1711 line, through the Snowshoe POD, and then down a Company line called the Snowshoe Lateral.

28. Access to the TCO 1711 pipeline via the Snowshoe Lateral allows retail customers and natural gas suppliers in the State College area to purchase local Marcellus Shale gas as well as Leidy Station gas.

29. In 2011 and 2012, the Company repeatedly pointed to the accessibility of the three pipelines – DTI, TETCO and TCO 1711 via the Snowshoe Lateral – as a reason for PSU to keep its gas on the Company's system, rather constructing its own line bypassing the Company's lines.

30. On January 30, 2013, PSU and the Company entered into a flex service contract.

31. In or about April 2015, the Company bought up long-term firm capacity rights on the DTI pipeline.

32. On May 5, 2015, PSU received notice from the Company that it intended to abandon the Snowshoe Lateral.

33. One reason proffered by the Company for its decision to abandon the Snowshoe Lateral the fact that its condition had deteriorated to a substantial degree.

34. The Company did not notify PSU of its intention to abandon the Snowshoe Lateral until after the Company had finished buying up firm capacity on the DTI pipeline.

35. When the Snowshoe Lateral is abandoned, customers and natural gas marketers in the State College area will be unable to purchase the Marcellus Shale gas and Leidy Station gas that had been available on the TCO 1711 pipeline and the Snowshoe Lateral.

36. Section 523(a) of the Public Utility Code provides that the Company's requested rate increase must be judged in light of the efficiency, effectiveness and adequacy of its service:

The commission shall consider, in addition to all other relevant evidence of record, the efficiency, effectiveness and adequacy of service of each utility when determining just and reasonable rates under this title. On the basis of the commission's consideration of such evidence, it shall give effect to this section by making such adjustments to specific components of the utility's claimed cost of service as it may determine to be proper and appropriate. Any adjustment made under this section shall be made on the basis of specific findings upon evidence of record, which findings shall be set forth explicitly, together with their underlying rationale, in the final order of the commission.

66 Pa. C.S. § 523(a).

37. Section 526 of the Public Utility Code provides for rejection of a utility's requested rate increase due to inadequate quality or quantity of service:

The commission may reject, in whole or in part, a public utility's request to increase its rates where the commission concludes, after hearing, that the service rendered by the public utility is inadequate in that it fails to meet quantity or quality for the type of service provided.

66 Pa. C.S. § 526(a).

38. The Company's failure to keep the Snowshoe Lateral in good repair renders the Company's transportation service in the State College area inefficient, ineffective and inadequate.

39. The Company's decision to abandon the Snowshoe Lateral renders the Company's transportation service in the State College area inefficient, ineffective and inadequate.

40. The Company's failure to give timely notice to customers served by the Snowshoe Lateral of the Company's decision to abandon the Snowshoe Lateral renders the Company's transportation service in the State College area inefficient, ineffective and inadequate.

41. The Company's surreptitious buying up of DTI firm capacity prior to announcing its decision to abandon the Snowshoe Lateral renders the Company's transportation service in the State College area inefficient, ineffective and inadequate.

42. WHEREFORE, The Pennsylvania State University requests that the rate approvals, and the increase or allocation thereof requested by Columbia Gas of Pennsylvania, Inc., be denied as being unjust, unreasonable and not in the public interest at this juncture, that The Pennsylvania State University be allowed to participate with full party status in the proceeding, and that the Presiding Administrative Law Judge and/or the Commission enter an Order as appropriate to grant such relief.

Respectfully submitted,



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*Counsel for The Pennsylvania State University*

Dated: July 31, 2015

## VERIFICATION

I, Robert E. Cooper, Director, Energy and Engineering, The Penn State University ("PSU"), hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I or any representative or witness on behalf of PSU expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink, appearing to read 'R. E. Cooper', is written over a horizontal line.

Robert E. Cooper, Director  
Energy and Engineering  
The Penn State University

## CERTIFICATE OF SERVICE

Docket Nos. R-2015-2468056, C-2015-2473682,  
C-2015-2477816; C-2015-2477120 and C-2015-2476623

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### Via Electronic and First Class U.S. Mail

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*Counsel for CAUSE-PA*

  
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Thomas J. Sniscak  
Christopher M. Arfaa  
William E. Lehman

Dated: July 31, 2015