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February 18, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265


**Re: Application for Approval of Abandonment of Service by Columbia Gas of Pennsylvania, Inc. of Natural Gas Service to Six (6) Customers Located in Centre County, Pennsylvania
Docket No. A-2015-2513395**

**Robert Bucha v. Columbia Gas of Pennsylvania, Inc.
Docket No. C-2016-2528019**

Dear Secretary Chiavetta:

Enclosed please find the Motion to Consolidate of Columbia Gas of Pennsylvania, Inc. ("Columbia") in the above-referenced proceeding. The Complaint of Mr. Bucha, at Docket No. C-2016-2528019, concerns Columbia's proposal to abandon service to six customers, including Mr. Bucha, located in Centre County, Pennsylvania. This proposal is the subject of a pending Application to Abandon Service at Docket No. A-2015-2513395. Mr. Bucha was served with Columbia's Application to Abandon Service, and has included in his Complaint a late-filed Protest to the Application. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin T. Ryan

Associate

DTR/skr

Enclosure

cc: Certificate of Service
Honorable Mary D. Long

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL:

Thomas J. Sniscak, Esquire
Christopher M. Arfaa, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105

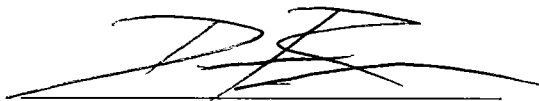
Amy E. Hirakis, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Rhonda Decker
1706 Egypt Hollow Road
Bellefonte, PA 16823

Thomas S. Smith
1752 Egypt Hollow Road
Bellefonte, PA 16823

Robert Bucha
11751 Egypt Hollow Road
Bellefonte, PA 16823-4535

Date: February 18, 2016



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA :
: Docket No. A-2015-2513395
:

Robert Bucha :
: Docket No. C-2016-2528019
v. :
: Columbia Gas of Pennsylvania, Inc. :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Respectfully submitted,



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Date: February 18, 2016

*Attorneys for Columbia Gas of
Pennsylvania, Inc.*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA : : : Docket No. A-2015-2513395

Robert Bucha : : :
v. : : : Docket No. C-2016-2528019
Columbia Gas of Pennsylvania, Inc. : :

**MOTION TO CONSOLIDATE OF
COLUMBIA GAS OF PENNSYLVANIA, INC.**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) hereby moves for the consolidation of the above-captioned matters pursuant to 52 Pa. Code § 5.81. Specifically, the Company is requesting that the proceeding at Docket No. C-2016-2528019 be consolidated with the proceeding at Docket No. A-2015-2513395. Columbia respectfully requests that these proceedings be consolidated for purposes of hearings and adjudication because they raise common issues of fact and law. Therefore, consolidating these proceedings will promote the prompt, efficient, and consistent administration of justice. In support of this Motion, Columbia states as follows:

1. Columbia is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business at 121 Champion Way, Suite 100, Canonsburg, PA 15317. Columbia is engaged in the business of selling and distributing natural gas to retail customers within the Commonwealth and, therefore, is a “public utility” within the meaning of Section 102 of the Public Utility Code, 66 Pa. C.S. § 102, subject to the regulatory jurisdiction of the Commission. Columbia provides natural gas service to approximately 421,000 customers in 26 counties of Pennsylvania, pursuant to certificates of public convenience granted by the Commission.

2. On October 30, 2015, Columbia filed the above-captioned Application with the Pennsylvania Public Utility Commission (“Commission”) at Docket No. A-2015-2513395. The Application sought Commission approval for Columbia to abandon natural gas distribution service to six customers located in Centre County, PA. The proposed abandonment stems from the planned removal of a portion of the Snowshoe Lateral.

3. The Snowshoe Lateral is an approximately 21-mile high pressure transmission pipeline that extends from a connection point on the Columbia Pipeline Group’s Columbia Gas Transmission, LLC (“TCO”) interstate pipeline near Snow Shoe, PA, to a point near Pleasant Gap, PA. Columbia originally intended to replace the entire length of the Snowshoe Lateral at an estimated cost of \$53 million. Subsequently, Columbia identified an alternative that would allow the Company to save \$36.9 million in capital restoration costs by abandoning about 54,200 feet of the Snowshoe Lateral. There are currently six customers served off of this over 10-mile section of pipe.

4. Copies of the Application were served via certified mail on the six customers whose service would be abandoned pursuant to the Application. In addition, Notice of the Application was published in the Pennsylvania Bulletin on November 28, 2015. Further, pursuant to Commission directive, Notice of the Application was published in the Centre Daily Times on November 20, 2015. The published Notices stated that Protests or Petitions to Intervene in the Application proceeding were due by December 14, 2015.

5. On December 10, 2015, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Public Statement at Docket No. A-2015-2513395.

6. On December 11, 2015, Protests to the Application were filed by Thomas S. Smith and Rhonda Decker at Docket No. A-2015-2513395.

7. On December 14, 2015, The Pennsylvania State University (“PSU”) filed a Petition to Intervene at Docket No. A-2015-2513395.¹

8. On January 11, 2016, a Prehearing Conference Order was issued.

9. On January 28, 2016, a prehearing conference was held by telephone.

10. On January 29, 2016, the ALJ issued a Prehearing Order establishing the litigation schedule and procedural rules for the proceeding.

11. Relevant to the instant Motion to Consolidate, an informal complaint concerning Columbia’s proposed abandonment was filed by Robert Bucha in December

¹ On December 3, 2015, the Commission entered an Opinion and Order in Columbia’s base rate proceeding at Docket No. R-2015-2468056, which approved a settlement between Columbia and The Pennsylvania State University (“PSU”). Pursuant to that settlement, the Commission removed PSU’s amended complaint from the base rate proceeding and consolidated it with the above-captioned Application proceeding. Further, PSU’s complaint, as amended by PSU on August 7, 2015, was re-docketed at Docket No. C-2016-2522399. On January 18, 2016, PSU filed a Notice of Withdrawal and Satisfaction of Amended Complaint. By Prehearing Order dated January 29, 2016, Administrative Law Judge Mary D. Long (the “ALJ”) directed that the amended complaint be marked closed.

2015. The informal complaint was dismissed by the Commission's Bureau of Consumer Services ("BCS") on January 11, 2016.

12. By Secretarial Letter dated February 8, 2016, Columbia was served with the Formal Complaint of Robert Bucha filed at Docket No. C-2016-2528019 ("Bucha Complaint). The Bucha Complaint raises issues concerning the proposed abandonment of Mr. Bucha's natural gas service resulting from Columbia's proposal to abandon a portion of the Snowshoe Lateral. In the Complaint, Mr. Bucha requests that he not be forced to switch to propane gas and that he be compensated for certain upgrades to electric appliances. (Bucha Complaint ¶ 5) The Complaint also includes a late-filed Protest to the Application.

13. Columbia herein respectfully requests that the Bucha Complaint proceeding at Docket No. C-2016-2528019 be consolidated with the ongoing proceeding at Docket No. A-2015-2513395 for purposes of discovery, litigation, and disposition.

14. The above-mentioned proceedings are interrelated and raise common issues of law and fact. Columbia's Application seeks authority to abandon natural gas service to six customers located in Centre County, PA, including Mr. Bucha. In his Complaint, Mr. Bucha contests the Company's proposed abandonment of his natural gas service. Because the disposition of each of these matters is interrelated, the consolidation of these proceedings will promote the efficient use of the time and resources of the parties and the Commission.

15. In addition, Mr. Bucha's Complaint includes a late-filed Protest. Columbia does not oppose the late-filed Protest, provided that Mr. Bucha's Protest be consolidated with the above-mentioned proceedings and that Mr. Bucha be required to comply with the procedural schedule already established. A Protest is the proper pleading to oppose

an Application. See 52 Pa. Code § 5.51; *Application of Douglasville Water Co.*, Docket No. A-210760, 1990 Pa. PUC LEXIS 58, at *2-8 (Order Entered Aug. 24, 1990) (dismissing complaint that was treated as a protest to an application because it was filed after the protest due date); *Application of Philadelphia Suburban Water Co.*, Docket No. A-212370F0059, 2001 Pa. PUC LEXIS 8, at * 1-2 (Order Entered June 21, 2001) (treating a complaint concerning an application to provide water service as a protest to the application). A Protestant should not be permitted to bypass the abandonment application process by filing a separate complaint concerning the proposed abandonment. See *Application of Douglasville Water Co.*, 1990 Pa. PUC LEXIS at *2-8.

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that Administrative Law Judge Mary D. Long enter an order consolidating the Bucha Complaint proceeding at Docket No. C-2016-2528019 with the ongoing proceeding at Docket No. A-2015-2513395.

Respectfully submitted,



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Date: February 18, 2016

*Attorneys for Columbia Gas of
Pennsylvania, Inc.*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA : :
: :
: :
: : Docket No. A-2015-2513395
: :
: :

Robert Bucha : :
: :
v. : : Docket No. C-2016-2528019
: :
Columbia Gas of Pennsylvania, Inc. : :

PROPOSED ORDER

AND NOW, in consideration of the Motion to Consolidate filed on February 18, 2016, by Columbia Gas of Pennsylvania, Inc. in the above-captioned matters,

IT IS ORDERED:

1. That the Motion to Consolidate filed by Columbia Gas of Pennsylvania, Inc. is granted, consistent with this Order.
2. That the proceeding Robert Bucha v. Columbia Gas of Pennsylvania, Inc., at Docket No. C-2016-2528019, shall be consolidated with the case captioned Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA, at Docket No. A-2015-2513395, for purposes of discovery, litigation, and disposition.

3. The Parties are directed to use the following caption and docket number for every document filed in these consolidated cases:

Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA

Docket No. A-2015-2513395, *et al.*

4. A copy of any document filed with the Commission's Secretary or submitted shall be sent directly to the undersigned. Service on the undersigned shall be by hard copy to the following address: Administrative Law Judge Mary D. Long, Pennsylvania Public Utility Commission, Suite 220, Piatt Place, 301 Fifth Avenue, Pittsburgh, PA 15222.

Date

Mary D. Long
Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA : : : : Docket No. A-2015-2513395

Robert Bucha : : : :
v. : : : : Docket No. C-2016-2528019
Columbia Gas of Pennsylvania, Inc. : : : :

VERIFICATION

I, Nicole Paloney, being Director of Regulatory Affairs of Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a 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).

Date: 2/18/16

Nicole Paloney
Nicole Paloney