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April 26, 2016

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 No. R-2016-2529660; **PREHEARING CONFERENCE MEMORANDUM OF SHIPLEY CHOICE, LLC, AMERIGREEN ENERGY, INTERSTATE GAS SUPPLY, INC. AND DOMINION RETAIL, INC.**

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Prehearing Conference Memorandum of Shipley Energy, AMERIGreen Energy, Interstate Gas Supply, Inc. and Dominion Retail, Inc. ("NGS Parties") in the above-captioned proceeding. 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 Energy, AMERIGreen Energy, IGS Energy and Dominion Retail, Inc. ("NGS Parties")*

TSS/jld  
Enclosure

cc: Honorable Katrina L. Dunderdale (via electronic mail and FedEx overnight delivery)  
Per Certificate of Service

## 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

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DATED: April 26, 2016

  
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Todd S. Stewart

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
	:	
v.	:	Docket Nos.: R-2016-2529660
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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

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Pursuant to the Prehearing Order dated April 22, 2016 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 (“Shipley”), AMERIGreen Energy (“AMERIGreen”), 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 18, 2016, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”) filed a Supplement No. 241 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 241”) seeking to increase operating revenues by approximately \$46.2 million, or approximately 8.63%. By Order dated April 21, 2016, the Pennsylvania Public Utility Commission (“Commission”) suspended the effective date of the tariff until December 19, 2016.

2. On April 6, 2016, the NGS Parties petitioned to intervene in the above-captioned proceeding.

## **II. EXPECTED ISSUES**

3. The NGS Parties have preliminarily identified the following two issues as being problematic: 1) Columbia's proposed change with regard to distribution nominations (Section 2.7.2) which identifies actions Columbia may take in order to comply with upstream pipeline restrictions so as to maintain operational integrity, importantly including the ability to require deliveries at alternate delivery points rather than a city gate (also Section 4.9.5); and, 2) the need for natural gas suppliers ("NGS") to include the enrollment type (telephone, Internet and/or in writing) when enrolling a customer (Section 4.6.5). The NGS Parties continue to review the filing and reserve the right to raise any additional issues in direct testimony or at other appropriate stages of the proceeding.

## **III. PROPOSED WITNESSES**

4. The NGS Parties have not yet identified any witnesses for this matter and will do so and provide notice to Your Honor and the other parties at the earliest possible time. The NGS Parties reserve the right to offer additional witnesses as necessitated by the issues.

## **IV. LITIGATION SCHEDULE**

5. The NGS Parties note Your Honor's communications about potential hearing dates and note that Mr. Stewart will be unavailable from July 26 through August 10, 2016. If it is not possible to avoid holding hearings during that time period, a different attorney from the same firm will participate in Mr. Stewart's stead. The NGS Parties are committed to working with the other parties and Your Honor to develop a schedule that meets all the parties' needs.

## **V. DISCOVERY**

6. The NGS Parties have not submitted discovery as of the date of this prehearing memorandum but will endeavor to do so as soon as possible. The NGS Parties will work

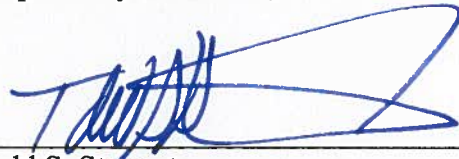
cooperatively with the Company and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judge. Moreover, the NGS Parties would not object to the typical discovery modifications proposed by the Office of Consumer Advocate in cases 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 to be held telephonically on Thursday, April 28, 2016 at 10:00 AM.

Respectfully submitted,



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DATED: April 26, 2016