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April 27, 2016

**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: Pennsylvania Public Utility Commission, et al. v. Columbia Gas of  
Pennsylvania; Docket Nos. R-2016-2529660, et al.; **PREHEARING  
CONFERENCE MEMORANDUM OF THE PENNSYLVANIA STATE  
UNIVERSITY**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Prehearing Conference Memorandum of The Pennsylvania State University in the above-referenced docket. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

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

*Counsel for  
The Pennsylvania State University*

TJS/das

Enclosures

cc: Hon. Katrina L. Dunderdale  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |   |            |                |
|--|---|------------|----------------|
| Pennsylvania Public Utility Commission | : | Docket No. | R-2016-2529660 |
| Office of Consumer Advocate            | : |            | C-2016-2535301 |
| Office of Small Business Advocate      | : |            | C-2016-2538051 |
| Ralph Miller                           | : |            | C-2016-2538611 |
| Michael Pikus                          | : |            | C-2016-2548843 |
|  | : |            |                |
| v.                                     | : |            |                |
|  | : |            |                |
| Columbia Gas of Pennsylvania, Inc.     | : |            |                |

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE PENNSYLVANIA STATE UNIVERSITY**

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**TO: THE HONORABLE KATRINA L. DUNDERDALE:**

On April 22, 2016, an Order was issued by the Pennsylvania Public Utility Commission (“Commission”) setting a Telephonic Prehearing Conference in the above-captioned proceeding for Thursday, April 28, 2016 at 10:00 a.m. before the Honorable Katrina L. Dunderdale. On April 22, 2016, Administrative Law Judge (“ALJ”) Katrina L. Dunderdale issued a Prehearing Conference Order requiring each party to file a Prehearing Conference Memorandum by noon on April 27, 2016.

The Pennsylvania State University (“PSU”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Conference Memorandum.

**I. ACCEPTANCE OF SERVICE**

Service of paper documents in this proceeding shall be accepted on behalf of PSU by:

Thomas J. Sniscak, Esquire  
Christopher M. Arfaa, Esquire  
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Counsel for PSU also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak ([tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)), Christopher M. Arfaa ([cmarfaa@hmslegal.com](mailto:cmarfaa@hmslegal.com)) and William E. Lehman ([welehman@hmslegal.com](mailto:welehman@hmslegal.com)). PSU is willing to extend the same courtesy upon request of any other party for any e-mails or electronic service to the parties.

**II. SETTLEMENT**

There have been no settlement discussions to date, but PSU is willing to participate in settlement discussions with the other parties.

**III. DISCOVERY**

PSU takes no position on modification of the discovery schedule at this time but is willing to work with the parties on mutually agreeable modifications.

**IV. SCHEDULE**

PSU is working with the other parties to develop a mutually satisfactory schedule for consideration by Your Honor at the Prehearing Conference.

## V. WITNESSES

PSU reserves the right to offer the Direct Testimony of James L. Crist in support of its positions. Mr. Crist's business address, telephone number and e-mail address are:

James L. Crist  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
(412) 487-9708  
JLCrist@aol.com

PSU requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted (other than Columbia's initial filing materials) be e-mailed directly to Mr. Crist at JLCrist@aol.com.

If called, Mr. Crist may present testimony regarding the revenue required by the Company and the allocation of that revenue to the various tariffs, along with the rate design and operational requirements of specific rate schedules and also may present testimony in response to testimony or exhibits offered by any other party. Mr. Crist may also present testimony concerning the Company's proposed Gas Procurement Charge. Mr. Crist reserves his right to also present testimony on any further issue that may arise as a result of further review of the filing, discovery or testimony or any position taken by any other party to this proceeding.

Additionally, PSU may offer the direct testimony of a member of its Office of Physical Plant - Energy and Engineering Division regarding rate issues created or raised by the filing and its offered supporting information. PSU reserves the right to present additional witnesses should its discovery or its review of responses to the discovery of other parties raise additional issues.

PSU reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

## **VI. ISSUES**

At this juncture, and subject to discovery and issues raised by PSU and by other parties, PSU intends to address the issue of whether the service PSU takes under certain rate categories may be burdened with a disproportionate share of the overall increase requested. 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.

Furthermore, 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.

PSU's position will be finalized in its evidence and briefs submitted under the schedule developed in this case.

## **VII. EVIDENCE**

PSU reserves the right to submit pre-filed direct testimony and associated exhibits addressing the issues identified in the preceding section. PSU may also present additional testimony and exhibits after discovery or in response to testimony or exhibits introduced by any party or witness in this proceeding.

WHEREFORE, The Pennsylvania State University respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



Thomas J. Sniscak, Attorney I.D. # 33891  
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*Counsel for  
The Pennsylvania State University*

Dated: April 27, 2016

## 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).

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**Certificate of Service**  
(continued)

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*Counsel for NGS Parties*



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

Dated this 27<sup>th</sup> day of April, 2016