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File #: 163209

June 13, 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**

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Dear Secretary Chiavetta:

Enclosed please find the Petition of Columbia Gas of Pennsylvania, Inc. to Reopen the Record in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Devin T. Ryan', with a long, sweeping underline.

Devin T. Ryan

DTR/skr

Enclosure

cc: Certificate of Service  
Honorable Mary D. Long

**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  
:  
:  
Columbia Gas of Pennsylvania, Inc. :

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**PETITION OF  
COLUMBIA GAS OF PENNSYLVANIA, INC.  
TO REOPEN THE RECORD**

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**TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:**

Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) hereby files this Petition to Reopen the Record for the limited purpose of updating the evidentiary record to clarify the service address of Robert Bucha. To ensure that the record is as accurate as possible, Columbia submits that it is necessary and appropriate to reopen the record pursuant to Section 5.571 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.571, to make this clarification.<sup>1</sup> In support thereof, Columbia states as follows:

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<sup>1</sup> Pursuant to Section 5.571 of the Commission’s regulations, an evidentiary record may be reopened upon the following:  
(a) At any time after the record is closed but before a final decision is issued, a party may file a petition to reopen the proceeding for the purpose of taking additional evidence.

1. 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 seeks Commission approval for Columbia to abandon natural gas distribution service to six customers located in Centre County, Pennsylvania. The proposed abandonment stems from the planned removal of a portion of a high pressure transmission pipeline that is known as the Snowshoe Lateral.

2. By Secretarial Letter dated February 8, 2016, Columbia was served with the Formal Complaint of Robert Bucha filed at Docket No. C-2016-2528019. Mr. Bucha’s complaint raised 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. Mr. Bucha is one of the six customers whose service Columbia has proposed to abandon. (Columbia Exh. No. 1, p. 7) The complaint also included a late-filed Protest to the Application.

3. On February 18, 2016, Columbia filed a Motion to Consolidate the Application proceeding at Docket No. A-2015-2513395 with the Bucha complaint proceeding at Docket No. C-2016-2528019.

4. On February 25, 2016, Columbia served the direct testimony and exhibits of Nicole M. Paloney (Columbia St. No. 1), Robert C. Waruszewski (Columbia St. No. 2),

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(b) A petition to reopen must set forth clearly the facts claimed to constitute grounds requiring reopening of the proceeding, including material changes of fact or of law alleged to have occurred since the conclusion of the hearing.

(c) Within 10 days following the service of the petition, another party may file an answer thereto.

(d) The record may be reopened upon notification to the parties in a proceeding for the reception of further evidence if there is reason to believe that conditions of fact or of law have so changed as to require, or that the public interest requires, the reopening of the proceeding.

(1) The presiding officer may reopen the record if the presiding officer has not issued a decision or has not certified the record to the Commission. . . .

52 Pa. Code § 5.571.

and Nelson W. White (Columbia St. No. 3). In addition, Ms. Decker and Mr. Smith, two of the Protestants in this proceeding, served their direct testimony and exhibits.

5. On February 29, 2016, Mr. Bucha served his direct testimony and exhibits.

6. On March 10, 2016, the ALJ issued an Interim Order granting Columbia's Motion to Consolidate the Application proceeding at Docket No. A-2015-2513395 with the Bucha complaint proceeding at Docket No. C-2016-2528019.

7. On March 24, 2016, Columbia served the rebuttal testimony and exhibits of Robert C. Waruszewski (Columbia St. No. 2R) and Nelson W. White (Columbia St. No. 3R).

8. On April 8, 2016, Columbia served the supplemental rebuttal testimony and exhibits of Robert C. Waruszewski (Columbia St. No. 2R-S). Further, Columbia advised the ALJ that it had reached agreements with all six of the customers whose natural gas service Columbia is proposing to abandon.

9. On April 14, 2016, the ALJ issued an Interim Order converting the initial in-person hearing scheduled for April 21, 2016, into a telephonic hearing. Also, Columbia filed a Motion for a Protective Order.

10. On April 19, 2016, the ALJ issued an Interim Order granting Columbia's Motion for a Protective Order.

11. On April 21, 2016, a telephonic hearing was held at which Columbia's preserved testimony and exhibits were admitted into the record. Since all of the Protestants reached agreements with the Company and advised that they no longer oppose the proposed abandonment of natural gas service, none of the Protestants moved their testimony and exhibits into the record.

12. The evidentiary record was closed on May 31, 2016.

13. After the record was closed, it was brought to Columbia's attention that Columbia's direct testimony (Columbia Statement No. 1), rebuttal testimony (Columbia Statement No. 3R), and Application (Columbia Exhibit No. 1) incorrectly identified Mr. Bucha's address as 1753 Egypt Hollow Road. As set forth in the agreement for compensation reached by Columbia and Mr. Bucha (CONFIDENTIAL Columbia Exhibit RCW-1R) and the Joint Petition for Approval of Settlement, Mr. Bucha's address is 1751 Egypt Hollow Road.

14. Columbia submits that it is necessary and appropriate to reopen the record for the limited purpose of correcting Mr. Bucha's address in Columbia Statement No. 1, Columbia Statement No. 3R, and Columbia Exhibit No. 1. Ensuring that the record accurately reflects Mr. Bucha's correct address is in the public interest, as Columbia is seeking approval to abandon natural gas service to his residence. *See* 52 Pa. Code § 5.571(d) (stating that the record may be reopened if there is reason to believe that conditions of fact have so changed as to require or that the public interest requires the reopening of the record).

15. Based on the foregoing, Columbia respectfully requests that the evidentiary record be reopened for the limited purpose of correcting Mr. Bucha's address as set forth in the revised pages of Columbia Statement No. 1, Columbia Statement No. 3R, and Columbia Exhibit No. 1, attached hereto as Attachments A, B, and C, respectively. The Company also has included redline copies of the revised pages to show the revisions more clearly. Further, all of the revised pages are accompanied by verifications signed by Columbia's witnesses attesting to the facts set forth therein.

16. Columbia has contacted all other parties in this proceeding, and they do not object to this Petition.

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that Administrative Law Judge Mary D. Long grant this Petition and reopen the record for the limited purpose of revising Columbia Statement No. 1, Columbia Statement No. 3R, and Columbia Exhibit No. 1 as set forth in Attachments A, B, and C to clarify Mr. Robert Bucha's address in the evidentiary record.

Respectfully submitted,



Theodore J. Gallagher (ID # 90842)  
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Andrew S. Tubbs (ID # 80310)  
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Michael W. Hassell (ID # 34851)  
Michael W. Gang (ID # 25670)  
Devin T. Ryan (ID # 316602)  
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E-mail: mgang@postschell.com  
E-mail: dryan@postschell.com

Date: June 13, 2016

*Attorneys for Columbia Gas of  
Pennsylvania, Inc.*

## 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  
Harrisburg, PA 17101

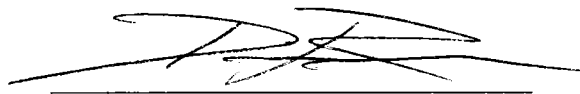
Amy E. Hirakis, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Rhonda Decker  
1706 Egypt Hollow Road  
Bellefonte, PA 16823

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

Robert Bucha  
1751 Egypt Hollow Road  
Bellefonte, PA 16823-4535

Date: June 13, 2016

  
Devin T. Ryan

**ATTACHMENT A'**

**Revised Page of Columbia Statement No. 1**

1 Pennsylvania; 120 Doe Ridge Lane, Bellefonte, Pennsylvania; and 1706, 1752, and  
2 1751 Egypt Hollow Road, Bellefonte, Pennsylvania.

3 **Q. Can you provide some detail as to the location of the Snowshoe Lateral,**  
4 **the section of the Lateral that Columbia proposes to abandon, and the**  
5 **location of the six customers to whom Columbia wishes to abandon**  
6 **service?**

7 **A.** Yes, please see Exhibit NMP-1, attached to my testimony, which is a map that  
8 depicts the current route of the Snowshoe Lateral, identifies the section to be  
9 abandoned, and shows the locations of the six affected customers.

10 **Q. What will you be addressing in your testimony?**

11 **A.** I will describe Columbia's historic use of the Snowshoe Lateral. Moreover, I will  
12 explain the Company's initial determination that the Snowshoe Lateral should be  
13 replaced in its entirety. Further, I will describe the circumstances that arose which  
14 enabled the Company to reconsider that initial determination and ultimately  
15 determine that the appropriate course of action is to abandon the middle section of  
16 the Snowshoe Lateral and seek Commission authority to abandon natural gas  
17 service to the six affected customers.

18 **Q. Please describe the Snowshoe Lateral and how it has been utilized by**  
19 **Columbia.**

20 **A.** The Snowshoe Lateral is an approximate 21-mile long, 8-inch steel pipeline placed  
21 into service by a predecessor of Columbia in 1958. The Snowshoe Lateral originates  
22 at an interconnection with Columbia Gas Transmission, LLC ("TCO") in northern

1 Pennsylvania; 120 Doe Ridge Lane, Bellefonte, Pennsylvania; and 1706, 1752, and  
2 ~~1753-1751~~ Egypt Hollow Road, Bellefonte, Pennsylvania.

3 **Q. Can you provide some detail as to the location of the Snowshoe Lateral,**  
4 **the section of the Lateral that Columbia proposes to abandon, and the**  
5 **location of the six customers to whom Columbia wishes to abandon**  
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12 explain the Company's initial determination that the Snowshoe Lateral should be  
13 replaced in its entirety. Further, I will describe the circumstances that arose which  
14 enabled the Company to reconsider that initial determination and ultimately  
15 determine that the appropriate course of action is to abandon the middle section of  
16 the Snowshoe Lateral and seek Commission authority to abandon natural gas  
17 service to the six affected customers.

18 **Q. Please describe the Snowshoe Lateral and how it has been utilized by**  
19 **Columbia.**

20 **A.** The Snowshoe Lateral is an approximate 21-mile long, 8-inch steel pipeline placed  
21 into service by a predecessor of Columbia in 1958. The Snowshoe Lateral originates  
22 at an interconnection with Columbia Gas Transmission, LLC ("TCO") in northern

**ATTACHMENT B**

**Revised Page of Columbia Statement No. 3R**

1 Q. Please state your name and business address.

2 A. Nelson W. White, 121 Champion Way, Suite 100, Canonsburg, Pennsylvania.

3 Q. Are you the same Nelson W. White that filed direct testimony in this proceeding?

4 A. Yes.

5 Q. What is the purpose of your rebuttal testimony?

6 A. The purpose of my rebuttal testimony is to address a claim made in the Direct  
7 Testimony of protestants Rhonda Decker and Thomas Smith regarding potential  
8 additional customers located in the immediate area of the existing Egypt Hollow  
9 Road customers.

10 Q. Have you determined how many existing residences, besides the three existing  
11 customers, are located within 500 feet of the connection point in the immediate  
12 area of the Egypt Hollow Road customers?

13 A. Yes, there are 20 existing residences located within 500 feet of the point where the  
14 existing Snowshoe Lateral pipeline intersects Egypt Hollow Road. The addresses  
15 for those residences are 1715, 1726 and 1751 Egypt Hollow Road, 114, 115, 127, 128,  
16 149 and 150 Jack Pine Lane, and 966, 967, 973, 974, 980, 985,987, 1006, 1007,  
17 1012 and 1013 Runville Road.

18 Q. How did you determine the number of residences?

19 A. I plotted the approximate location of the intersection of the Snowshoe Lateral and  
20 Egypt Hollow Road on Google Earth Map and used the Google Earth Map  
21 measurement feature to identify residences within 500 feet. I obtained the address  
22 numbers from the protestants' Direct Testimony Attachment A. I have plotted the

1 Q. Please state your name and business address.

2 A. Nelson W. White, 121 Champion Way, Suite 100, Canonsburg, Pennsylvania.

3 Q. Are you the same Nelson W. White that filed direct testimony in this proceeding?

4 A. Yes.

5 Q. What is the purpose of your rebuttal testimony?

6 A. The purpose of my rebuttal testimony is to address a claim made in the Direct  
7 Testimony of protestants Rhonda Decker and Thomas Smith regarding potential  
8 additional customers located in the immediate area of the existing Egypt Hollow  
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13 A. Yes, there are 20 existing residences located within 500 feet of the point where the  
14 existing Snowshoe Lateral pipeline intersects Egypt Hollow Road. The addresses  
15 for those residences are 1715, 1726 and ~~1753-1751~~ Egypt Hollow Road, 114, 115, 127,  
16 128, 149 and 150 Jack Pine Lane, and 966, 967, 973, 974, 980, 985, 987, 1006, 1007,  
17 1012 and 1013 Runville Road.

18 Q. How did you determine the number of residences?

19 A. I plotted the approximate location of the intersection of the Snowshoe Lateral and  
20 Egypt Hollow Road on Google Earth Map and used the Google Earth Map  
21 measurement feature to identify residences within 500 feet. I obtained the address  
22 numbers from the protestants' Direct Testimony Attachment A. I have plotted the

**ATTACHMENT C**

**Revised Page of Columbia Exhibit No. 1**

(6) customers (“Snowshoe Customers”) located in Centre County, Pennsylvania that receive distribution service from that section of the pipeline. The names and addresses of the affected Customers are:

<b>Name</b>	<b>Address</b>
Ronald Hubler	877 Fountain Road, Snow Shoe, PA
John Lomax	901 Fountain Road, Snow Shoe, PA
Joseph Yindra	120 Doe Ridge Lane, Bellefonte, PA
Rhonda Decker	1706 Egypt Hollow Road, Bellefonte, PA
Robert Bucha	1751 Egypt Hollow Road, Bellefonte, PA
Thomas S Smith	1752 Egypt Hollow Road, Bellefonte, PA

Included as Attachment “A” to this Application is a schedule of gas delivered and revenue derived from the Snowshoe Customers over the most recent twelve month period available.

17. A map of the area affected by the proposed abandonment is included as Attachment “B” to this Application. The middle section of the Snowshoe Lateral is located in a rural area, and the only customers currently served directly off of the portion of the pipe to be abandoned are identified above. This section of the pipeline is not near any potential additional customers. Further development in the area is not likely to occur in the foreseeable future.

18. The middle section of the Snowshoe Lateral is nearly 60 years old and is made primarily of eight-inch steel pipe that needs to be retired. When considering whether to replace the middle section of the Snowshoe Lateral, Columbia determined that replacing that section would result in a net increase to capital investment in excess

(6) customers (“Snowshoe Customers”) located in Centre County, Pennsylvania that receive distribution service from that section of the pipeline. The names and addresses of the affected Customers are:

<b>Name</b>	<b>Address</b>
Ronald Hubler	877 Fountain Road, Snow Shoe, PA
John Lomax	901 Fountain Road, Snow Shoe, PA
Joseph Yindra	120 Doe Ridge Lane, Bellefonte, PA
Rhonda Decker	1706 Egypt Hollow Road, Bellefonte, PA
Robert Bucha	<del>1753</del> 1751 Egypt Hollow Road, Bellefonte, PA
Thomas S Smith	1752 Egypt Hollow Road, Bellefonte, PA

Included as Attachment “A” to this Application is a schedule of gas delivered and revenue derived from the Snowshoe Customers over the most recent twelve month period available.

17. A map of the area affected by the proposed abandonment is included as Attachment “B” to this Application. The middle section of the Snowshoe Lateral is located in a rural area, and the only customers currently served directly off of the portion of the pipe to be abandoned are identified above. This section of the pipeline is not near any potential additional customers. Further development in the area is not likely to occur in the foreseeable future.

18. The middle section of the Snowshoe Lateral is nearly 60 years old and is made primarily of eight-inch steel pipe that needs to be retired. When considering whether to replace the middle section of the Snowshoe Lateral, Columbia determined that replacing that section would result in a net increase to capital investment in excess

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

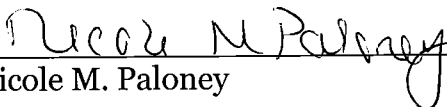
Application of Columbia Gas of Pennsylvania, Inc. for approval of the Abandonment of Service by Columbia Gas of Pennsylvania, Inc., of natural gas service to six (6) customers located in Centre County, PA : : Docket No. A-2015-2513395

**VERIFICATION**

I, Nicole M. Paloney, being Director of Rates and Regulatory Affairs of Columbia Gas of Pennsylvania, Inc., hereby state that the testimony set forth in Columbia Statement No. 1 (as revised) is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth herein. I further state that I am responsible for Columbia Exhibit No. 1 (as revised) and that it is true and correct to the best of my knowledge, information and belief.

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: June 1, 2016

  
\_\_\_\_\_  
Nicole M. Paloney

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

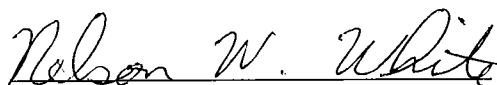
Application of Columbia Gas of :  
Pennsylvania, Inc. for approval of the :  
Abandonment of Service by Columbia : Docket No. A-2015-2513395  
Gas of Pennsylvania, Inc., of natural :  
gas service to six (6) customers located :  
in Centre County, PA :

**VERIFICATION**

I, Nelson W. White, being Manager of Field Engineering of Columbia Gas of Pennsylvania, Inc., hereby state that the testimony set forth in Columbia Statement No. 3R (as revised) is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth herein.

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: June 7, 2016

  
Nelson W. White