



Todd S. Stewart  
Office: 717 236-1300 x242  
Direct: 717 703-0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

March 30, 2018

**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, Inc.;  
Docket No. R-2018-2647577; **PETITION TO INTERVENE OF SHIPLEY  
CHOICE, LLC, DOMINION ENERGY SOLUTIONS, INC. AND  
INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Shipley Choice, LLC, Dominion Retail, Inc. and Direct Energy (the "NGS Parties") in the above-captioned docket. Copies of this Petition 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 Choice, LLC d/b/a Shipley  
Energy, Dominion Energy Solutions and Interstate  
Gas Supply, Inc. d/b/a IGS Energy (the "NGS  
Parties")*

TSS/jld/das

Enclosure

cc: Per Certificate of Service



2. The NGS Parties, all of which are licensed natural gas suppliers providing service in the Columbia of Pennsylvania service territory, are represented in the above-captioned matter by the following counsel:

Todd S. Stewart  
Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
100 N. Tenth Street  
Harrisburg, PA 17101  
Phone: (717) 236-1300  
Fax: (717) 236-4841  
Email: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

3. The NGS Parties currently serve customers throughout the spectrum of customer classes on the Columbia system, including residential, commercial and industrial customers. As such, they have a direct and immediate interest in any modifications to any tariff which could impact their ability to serve those customers and they have a clear interest in any tariff provisions, whether new or existing, that directly have impacted their ability to reasonably and fairly serve customers on the Columbia system.

4. The NGS Parties are still completing their final review of the rate filing and have not yet taken any specific positions on any issues. The NGS Parties will be prepared to state their other positions more fully at the time of the prehearing conference. Preliminarily, the NGS Parties note that the persistence of OFO's and OMO's on the Columbia system and the consequences of such orders for NGSs is a constant concern.

5. Because the NGS Parties serve customers on the Columbia system, where they are all licensed, they have a direct and immediate interest that is substantial and cannot be represented by any other party to this proceeding, and they clearly will be bound by any decision that the Commission might make about Columbia's requested rate increase and accompanying

tariff changes. Therefore, the NGS Parties request that their intervention be granted and that they be allowed full party status in this matter.

**WHEREFORE**, the NGS Parties hereby petition the Pennsylvania Public Utility Commission to intervene in the above-captioned matter and request full party status.

Respectfully submitted,



---

Todd S. Stewart  
PA Attorney I.D. #75556  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
E-mail: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841

*Counsel for Shipley Choice, LLC d/b/a Shipley Energy, Dominion Energy Solutions, Inc. and Interstate Gas Supply, Inc. d/b/a IGS Energy ("IGS") (the "NGS Parties")*

DATED: March 30, 2018

**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**

Michael W. Hassell, Esquire  
Lindsay A. Berkstresser, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Fl.  
Harrisburg, PA 17101  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[lberkstresser@postschell.com](mailto:lberkstresser@postschell.com)  
*Counsel for Columbia Gas of Pennsylvania, Inc.*

Theodore J. Gallagher, Esquire  
Nicole M. Paloney, Esquire  
Columbia Gas of Pennsylvania, Inc.  
121 Champion Way, Suite 100  
Canonsburg, PA 15317  
[tjgallagher@nisource.com](mailto:tjgallagher@nisource.com)  
[npaloney@nisource.com](mailto:npaloney@nisource.com)  
*Counsel for Columbia Gas of Pennsylvania, Inc.*

Erika L. McLain, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
PO Box 3265  
Harrisburg, PA 17105-3265  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Lauren Burge, Esquire  
Hayley E. Dunn, Esquire  
Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923  
[LBurge@paoca.org](mailto:LBurge@paoca.org)  
[HDunn@paoca.org](mailto:HDunn@paoca.org)  
[DLawrence@paoca.org](mailto:DLawrence@paoca.org)

John R. Evans, Esquire  
Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[jorevan@pa.gov](mailto:jorevan@pa.gov)

DATED: March 30, 2018

  
\_\_\_\_\_  
Todd S. Stewart