



Thomas J. Sniscak  
(717) 236-1300 x224  
[tjSniscak@hmslegal.com](mailto:tjSniscak@hmslegal.com)

William E. Lehman  
(717) 236-1300 x248  
[welhman@hmslegal.com](mailto:welhman@hmslegal.com)

Whitney E. Snyder  
(717) 236-1300 x260  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

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

April 6, 2018

**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 v. Columbia Gas of Pennsylvania, Inc.;  
Docket No. R-2018-2647577; **FORMAL COMPLAINT OF THE  
PENNSYLVANIA STATE UNIVERSITY**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Formal Complaint of The Pennsylvania State University in connection with the above-captioned docket. Copies of this document have been served in accordance with the attached Certificate of Service.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,

Thomas J. Sniscak  
William E. Lehman  
Whitney E. Snyder

*Counsel for The Pennsylvania State University.*

TJS/WEL/das  
Enclosure

cc: Per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2018-2647577  
 :  
 Columbia Gas of Pennsylvania, Inc. :

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**NOTICE TO PLEAD**

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TO: Michael W. Hassell, Esquire  
Lindsay A. Berkstresser, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
*Counsel for Columbia Gas of Pennsylvania, Inc.*

Theodore J. Gallagher, Esquire  
Columbia Gas of Pennsylvania, Inc.  
121 Champion Way, Suite 100  
Canonsburg, PA 15317

Pursuant to 52 Pa. Code §§5.21, 5.22 and 5.32, you are hereby notified that The Pennsylvania State University (“PSU”) has filed a Complaint in the above-captioned proceeding to which you may file an Answer within ten (10) days unless otherwise provided in Title 52 of the Pennsylvania Code. All Pleadings such as any Answer to this Complaint must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for The Pennsylvania State University.



Thomas J. Sniscak  
William E. Lehman  
Whitney E. Snyder  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[welehman@hmslegal.com](mailto:welehman@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

*Counsel for The Pennsylvania State University*

DATED: April 6, 2018

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-2647577
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**FORMAL COMPLAINT OF  
THE PENNSYLVANIA STATE UNIVERSITY**

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Pursuant to Chapters 7 and 13 of the Public Utility Code, 66 Pa.C.S. §§ 701 and 1301 *et seq*, and Sections 5.21, 5.22 & 5.32 of the Pennsylvania Public Utility Commission’s (“Commission”) Regulations, 52 Pa. Code §§ 5.21, 5.22 & 5.32, The Pennsylvania State University (“PSU”) hereby submits this Complaint against the above-captioned 2018 base rate general rate increase filing pursuant to 66 Pa.C.S. §1308(d) of Columbia Gas of Pennsylvania, Inc. (“Columbia Gas” or “Company”). In support of its Formal Complaint, PSU states as follows:

1. The Complainant, PSU, is the Commonwealth’s Land Grant University with its business addresses for purposes of this proceeding located at:

Office of Physical Plant  
The Pennsylvania State University  
Room 208 Physical Plant Building  
University Park, PA 16802-1118  
Attn: Robert E. Cooper, P.E.  
Director, Energy and Engineering

2. The names and address of counsel for PSU are:

Thomas J. Sniscak, Attorney I.D. No. 33891  
William E. Lehman, Attorney I.D. No. 83936  
Whitney E. Snyder, Attorney I.D. No. 316625  
Hawke McKeon & Sniscak, LLP  
100 N. 10<sup>th</sup> Street  
Harrisburg, PA 17101  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
tjsniscak@hmslegal.com  
welehman@hmslegal.com  
wesnyder@hmslegal.com

All correspondence in this proceeding from the Commission should be directed to the attention of Counsel at the address listed above.

3. The Respondent Utility is:

Columbia Gas of Pennsylvania, Inc.  
Southpoint Industrial Park  
121 Champion Way, Suite 100  
Canonsburg, PA 15317

4. On March 16, 2018, Columbia Gas filed Supplement No. 267 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 267”). Supplement No. 267 proposes to increase rates to produce additional annual operating revenues of \$46.9 million, which is an increase of 11.04% over present revenues. Columbia Gas proposed that the rate increase become effective on May 15, 2018.

5. PSU is a major customer of Columbia Gas for natural gas service for separate accounts under the following tariff rate classifications: LDS (Large Distribution Service); SDS (Small Distribution Service); SGDS (Small General Distribution Service); and RSS (Residential Sales Service). As a major customer, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby.

6. Pursuant to Section 315(a) of the Public Utility Code, 66 Pa.C.S. §315(a), Columbia Gas is the party with the burden to show its proposed rates, rules, and regulations are just and reasonable and that the proposed rates, rules, and regulations otherwise comply with the Public Utility Code, 66 Pa.C.S. §§ 1301 *et seq.*

7. Based upon its preliminary review of the filing, which is ongoing, PSU believes the rates, rules, regulations, terms and provisions contained in the above-referenced tariff filing appear to be unjust, unreasonable and discriminatory and may allocate the Company's proposed rate increase between customers in an unjust, unreasonable and discriminatory fashion.

8. The Company's proposed Gas Procurement Charge must be examined to determine if the costs allocated are appropriate and to determine if it serves to place Columbia's own system supply gas in a more favorable position.

9. The Company's cost allocations and Cost of Service Studies in part appear to be unreasonable and discriminatory as is the proposed distribution of its recommended revenue requirement.

10. Columbia's penalty and notice provisions regarding Operational Flow Orders ("OFO") and Operational Matching Orders ("OMO") appear to be unjust and unreasonable generally, and as applied to PSU, and unrelated to Columbia's actual costs when an OMO or OFO is not complied with, resulting in unjust and unreasonable penalties that go far beyond the purpose of the penalty.

**WHEREFORE**, The Pennsylvania State University requests that the rate approvals, and the increase or allocation thereof requested by Columbia Gas of Pennsylvania, Inc., be denied as being unjust, unreasonable and not in the public interest at this juncture, that The Pennsylvania State University be allowed to participate with full party status in the proceeding, and that the Presiding Administrative Law Judge and/or the Commission enter an Order as appropriate to grant such relief.

Respectfully submitted,



Thomas J. Sniscak  
William E. Lehman  
Whitney E. Snyder  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wlehman@hmslegal.com](mailto:wlehman@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
*Counsel for The Pennsylvania State University*

Dated: April 6, 2018

## VERIFICATION

I, Robert E. Cooper, Director, Energy and Engineering, The Penn State University ("PSU"), hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I or any representative or witness on behalf of PSU expect to be able to prove the same at any 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).

A handwritten signature in blue ink, appearing to read "R. E. Cooper", written over a horizontal line.

Robert E. Cooper, Director  
Energy and Engineering  
The Penn State University

## 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 U.S. MAIL

Honorable Jeffrey Watson  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

Daniel G. Asmus, Esquire  
Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[dasmus@pa.gov](mailto:dasmus@pa.gov)

Michael W. Hassell, Esquire  
Lindsay A. Berkstresser, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[lberkstresser@postschell.com](mailto:lberkstresser@postschell.com)

Lauren Burge, Esquire  
Hayley E. Dunn, Esquire  
Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
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)

*Counsel for  
Columbia Gas of Pennsylvania, Inc.*

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

Erika L. McLain, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

*Counsel for  
Columbia Gas of Pennsylvania, Inc.*

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

*Counsel for NGS Parties*

*Counsel for Community Action Association of  
Pennsylvania*



Thomas J. Sniscak  
William E. Lehman  
Whitney E. Snyder

Dated this 6th day of April, 2018