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April 16, 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; **PREHEARING CONFERENCE  
MEMORANDUM OF SHIPLEY CHOICE, LLC, DOMINION ENERGY  
SOLUTIONS, INC. AND INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

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

TSS/jld/  
Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (via electronic mail and 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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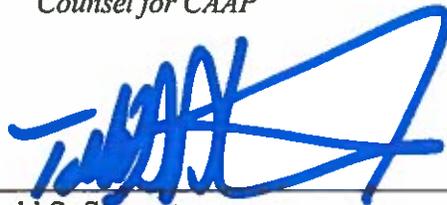
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DATED: April 16, 2018

Todd S. Stewart

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

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Pursuant to the Prehearing Order dated April 10, 2018 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”), Dominion Retail, Inc. d/b/a Dominion Energy Solutions (“DES”) and Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) (collectively “NGS Parties”), hereby submit their Prehearing Conference Memorandum.

**I. PROCEDURAL HISTORY**

1. On or about March 16, 2018, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”) filed a Supplement No. 267 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 267”) seeking to increase operating revenues by approximately \$49.9 million, or approximately 8.16%. By Order dated April 5, 2018, the Pennsylvania Public Utility Commission (“Commission”) suspended the effective date of the tariff until December 15, 2018.

2. On March 30, 2016, the NGS Parties petitioned to intervene in the above-captioned proceeding.

## **II. EXPECTED ISSUES**

3. The NGS Parties' preliminarily intend to address the following subjects: 1) Columbia's ongoing OFO/OMO conditions and the impacts on NGSs associated therewith; and, 2) Columbia's discriminatory policies with regard to including non-commodity charges on customer bills. 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, but 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 are committed to working with the other parties and Your Honor to develop a schedule that meets all the parties' needs. The NGS Parties note Mr. Stewart will likely be unavailable from August 1 through August 15, 2018. If it is not possible to avoid holding hearings during that time, a different attorney from the same firm will participate in Mr. Stewart's stead

## **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 Wednesday, April 18, 2018 at 9:00 am.

Respectfully submitted,



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*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: April 16, 2018