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April 17, 2018

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission, et al. v. Columbia Gas of Pennsylvania; Docket No. R-2018-2647577; **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
William E. Lehman
Whitney E. Snyder

*Counsel for
The Pennsylvania State University*

TJS/WEL/das
Enclosures

cc: Hon. Jeffrey Watson
Per Certificate of Service

Counsel for PSU also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak (tjsniscak@hmslegal.com), William E. Lehman (welehman@hmslegal.com), and Whitney E. Snyder (wesnyder@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, Cost of Service Studies and Columbia's penalty and notice provisions regarding Operational Flow Orders ("OFO") and Operational Matching Orders ("OMO") which appears 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.

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 issues created or raised by the filing and its offered supporting information and the OFO/OMO penalty provisions described above. 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 and whether 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 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. Additionally, 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.

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,



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*Counsel for
The Pennsylvania State University*

Dated: April 17, 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 U.S. MAIL

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Dated this 17th day of April, 2018