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File #: 172287

June 14, 2018

***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: Pennsylvania Public Utility Commission v. Peoples Natural Gas Company LLC and Peoples Natural Gas Company LLC - Equitable Division  
Docket Nos. R-2018-2645278 & R-2018-3000236**

**Pennsylvania Public Utility Commission v. Peoples Gas Company LLC  
Docket No. R-2018-2645296**

Dear Secretary Chiavetta:

Enclosed for filing is the Response of Peoples Natural Gas Company, LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples Gas Company LLC, to Pennsylvania Independent Oil & Gas Association’s On the Record Data Request in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl  
Enclosures

cc: Honorable Jeffrey Watson  
Certificate of Service

**CERTIFICATE OF SERVICE**  
**(Docket Nos. R-2018-2645278, R-2018-3000236 & R-2018-2645296)**

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 REGULAR MAIL**

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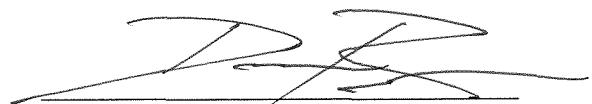
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Date: June 14, 2018

  
Devin T. Ryan

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |   |                |
|--|---|----------------|
| Pennsylvania Public Utility Commission | : | R-2018-2645278 |
| Office of Small Business Advocate      | : | C-2018-3000567 |
| Office of Consumer Advocate            | : | C-2018-3000494 |
|  | : |                |
| v.                                     | : |                |
|  | : |                |
| Peoples Natural Gas Company LLC        | : |                |
|  | : |                |
| Pennsylvania Public Utility Commission | : | R-2018-2645296 |
| Office of Small Business Advocate      | : | C-2018-3000574 |
| Office of Consumer Advocate            | : | C-2018-3000497 |
|  | : |                |
| v.                                     | : |                |
|  | : |                |
| Peoples Gas Company LLC                | : |                |
|  | : |                |
| Pennsylvania Public Utility Commission | : | R-2018-3000236 |
| Office of Small Business Advocate      | : | C-2018-3000573 |
| Office of Consumer Advocate            | : | C-2018-3000496 |
|  | : |                |
| v.                                     | : |                |
|  | : |                |
| Peoples Natural Gas Company LLC-       | : |                |
| Equitable Division                     | : |                |

**The Peoples Companies’ Answer to PIOGA’s On the Record Data Request**

Question No. 1:

How many utility customers are served off the interstate pipelines, differentiated between interstate transmission pipelines and interstate gathering pipelines, in Pennsylvania?

Answer:

The Peoples Companies do not have records of exactly how many utility customers are currently served off of interstate transmission and gathering pipelines in Pennsylvania.

However, in several proceedings before the Pennsylvania Public Utility Commission (“Commission”) and the Federal Energy Regulatory Commission (“FERC”), the Commission and FERC recognized that utility customers have been served off of transmission and gathering pipelines. *See Nat’l Fuel Gas Supply Corp.*, 65 FERC ¶ 61,131, p. 61,657 (1993) (observing that “about 1,200 residential and other small customers” of Clarion River Gas, Inc. and National Fuel Gas Distribution Corporation, which a Commission-regulated utility, are served directly off the gathering facilities owned by National Fuel Gas Supply Corporation, a FERC-regulated entity);

*Columbia Gas Transmission Corp.*, 106 FERC ¶ 61,297, PP 8, 10, 33 (2004) (finding that pipelines at issue, which would be “primarily perform[ing] an exempt gathering function” and “mak[ing] non-jurisdictional deliveries to local distribution customers,” were “non-jurisdictional gathering facilities”); *Columbia Gas Transmission Corp.*, 79 FERC ¶ 61,045, p. 61,205 (1997) (stating that “certificated and non-certificated” gathering facilities in Pennsylvania owned by Columbia Gas Transmission Corporation served “203 mainline tap consumers of Columbia [Gas] of Pennsylvania,” which is a Commission-regulated utility); *Carnegie Natural Gas Co.*, 64 FERC ¶ 61,164, 1993 FERC LEXIS 2439, at \*3-8 (1993) (noting that “Carnegie makes direct sales off its gathering system” in Pennsylvania to “residential and commercial (R & C) customers” and that FERC did not have “jurisdiction over sales made directly off Carnegie’s gathering system”); *Columbia Gas Transmission, LLC*, 133 FERC ¶ 61,082, PP 1, 6, 11-12 (2010) (approving abandonment of transmission pipe, off of which a “number of residential ‘mainline-tap’ customers” were served by Columbia Gas of Pennsylvania, Inc.); *Application of Equitable Gas Co. for Approval of Abandonment of Natural Gas Service to Twenty-Six (26) Field Line Customers Located in the Township of Richhill, Greene County, Pennsylvania*, 2009 Pa. PUC LEXIS 889, at \*1-5 (Order entered Mar. 3, 2009) (approving Equitable Gas Company’s abandonment of service to distribution customers served off of gathering facilities owned by Equitrans, L.P.); *Application for Approval of Abandonment of Service by Equitable Gas Co. to Twenty-Three (23) Field Gathering Line Customers in Washington County, Pennsylvania*, 2010 Pa. PUC LEXIS 1256, at \*1, 4-7, 24, 39-46 (Nov. 1, 2010) (Initial Decision on Remand) (approving Equitable Gas Company’s abandonment of service to distribution customers served off of Equitrans, L.P.’s “field gathering lines,” which “gather[ed] natural gas and deliver[ed] it to the interstate market”), *adopted*, Docket No. A-2009-2089152 (Order entered Aug. 1, 2011); *Lucey v. Columbia Gas of Pennsylvania, Inc.*, 2014 Pa. PUC LEXIS 44, at \*1-3, 21-23 (Order entered Feb. 6, 2014) (approving the utility’s abandonment of service to “one field gathering line customer” connected gathering facilities owned by Columbia Gas Transmission, LLC and dismissing the complaint filed by that customer).

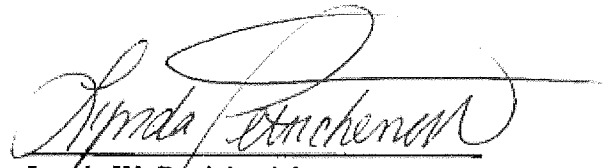
Witness: Lynda W. Petrichevich, Vice President, Regulatory Affairs

Date: June 14, 2018

**VERIFICATION**

I, Lynda W. Petrichevich, being Vice President, Regulatory Affairs for Peoples Natural Gas Company LLC, hereby state that the above Answer to the On the Record Data Request 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 answer would be as set forth therein. 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: 6/14/2018

  
Lynda W. Petrichevich