



National Fuel

Nathaniel J. Ehrman
Attorney

July 17, 2018

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

RE: John Smith Jr. v.
National Fuel Gas
Distribution Corporation
Docket No. C-2018-3003081

Dear Secretary Chiavetta:

Enclosed please find National Fuel Gas Distribution Corporation's Motion for Stay regarding the above-referenced Complaint.

Very truly yours,

Nathaniel J. Ehrman
(814) 871-8177

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOHN SMITH JR.,	:	
	:	MOTION TO STAY
Complainant,	:	
	:	
v.	:	
	:	
NATIONAL FUEL GAS	:	
DISTRIBUTION CORPORATION,	:	DOCKET NO. C-2018-3003081
	:	
Respondent.	:	

MOTION TO STAY

NOW COMES, Respondent, National Fuel Gas Distribution Corporation (“Respondent” or “Company”), by and through its attorney, Nathaniel J. Ehrman, Esquire, and files the following Motion to Stay the above-captioned Formal Complaint (“Complaint”) filed against it by John Smith Jr. (“Complainant”) with the Pennsylvania Public Utility Commission (“Commission”).

The Company is in the process of preparing its application (“Application”) for a Certificate of Public Convenience from the Commission pursuant to 66 Pa. C.S. section 1102(a)(2) authorizing the Company to abandon service to three customers, including the Complainant. When the Company files the Application, all impacted customers, including the Complainant, will have a right to appeal the Company’s request and have a hearing before the Commission. Accordingly, the Company requests that the above-captioned Complaint be stayed at this time and be consolidated with the Application once it is filed.

The Company reserves all rights to submit an answer to the Complaint at the appropriate time, and does not waive any of its rights or defenses. In the event that the Company’s request

for a stay is denied, the Company requests an extension of 15 days from such denial to submit its answer to the Complaint.

WHEREFORE, the Company respectfully requests that this matter be stayed until the Company files its application for a Certificate of Public Convenience.

Respectfully submitted,



Nathaniel J. Ehrman
Pa. I.D. No. 324920
Attorney for National Fuel Gas
Distribution Corporation
P.O. Box 2081
Erie, PA 16512

VERIFICATION

William F. Cvecko, Assistant General Manager- Land, for National Fuel Gas Distribution Corporation, being authorized to do so, verifies that the facts set forth in the foregoing Answer are true and correct to the best of his knowledge, information and belief. The undersigned further states that he understands false statements therein are made subject to the penalties of 18 Pa. C.S.A § 4904 relating to unsworn falsification to authorities.

William F. Cvecko

William F. Cvecko

Date: 7-17-2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOHN SMITH JR,

Complainant,

v.

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION,

Respondent.

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PROOF OF SERVICE

DOCKET NO. 2018-3003081

I hereby certify that I have this day served a true copy of the foregoing document upon the participant, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

John Smith Jr.
274 Big Bend Rd.
Emlenton, PA 16373

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION



Nathaniel J. Ehrman
Pa. I.D. No. 324920
Attorney for National Fuel Gas
Distribution Corporation
P.O. Box 2081
Erie, PA 16512

Dated: 7/17/2018