



**National Fuel**

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**Nathaniel J. Ehrman**  
*Attorney*

November 16, 2018

**VIA ELECTRONIC FILING**

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

RE: Dennis Kemery v.  
National Fuel Gas  
Distribution Corporation  
Docket No. C-2018-3006007

Dear Secretary Chiavetta:

Enclosed please find National Fuel Gas Distribution Corporation's Motion to Consolidate regarding the above-referenced Complaint with its pending Application for Abandonment at Docket No. A-2018-3005258.

Very truly yours,

Nathaniel J. Ehrman  
(814) 871-8177

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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DENNIS KEMERY,	:	
	:	<b>MOTION TO CONSOLIDATE</b>
Complainant,	:	
	:	
v.	:	
	:	
NATIONAL FUEL GAS	:	DOCKET NO. C-2018-3006007
DISTRIBUTION CORPORATION,	:	
	:	
Respondent.	:	

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**MOTION TO CONSOLIDATE**

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 Consolidate the above-captioned Formal Complaint (“Complaint”) filed against it by Dennis Kemery (“Complainant”) with the Pennsylvania Public Utility Commission (“Commission”).

The Company filed an Application of National Fuel Gas Distribution Corporation for approval of the Abandonment of service to Three (3) Natural Gas Service Customers located in Scrubgrass Township, Venango County, PA (Docket No. A-2018-3005258) on October 9, 2018 (the “Application”).

National Fuel believes the Complainant intended that the above-reverenced filing be a Formal Protest to its Application, and not a new Formal Complaint. This is supported by the Complainant listing the Docket Number of the Application on the line “Utility Account Number (from your bill).” Accordingly, the Company requests that the above-captioned Complaint be consolidated with the Application.

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.

WHEREFORE, the Company respectfully requests that this matter be consolidated with the Company's Application at Docket No. A-2018-3005258.

Respectfully submitted,



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

cc: Certificate of Service  
Administrative Law Judge Mary D. Long

**CERTIFICATE OF SERVICE**

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 FIRST CLASS MAIL  
RETURN RECEIPT REQUESTED**

William Kemery  
172 Highlands Road  
Emlenton, PA 16373

William Kemery  
c/o Dennis W. Kemery  
1344 Old Route 8  
Polk, PA 16342

Date: November 16, 2018



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Nathaniel J. Ehrman