



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166  
Tel: 717.232.8000 • Fax: 717.237.5300

Kenneth R. Stark  
Direct Dial: 717.237.5378  
kstark@mcneeslaw.com

June 2, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania;  
Docket Nos. R-2020-3018835 and C-2020-3018835**

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Memorandum of the Columbia Industrial Intervenors ("CII") in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Kenneth R. Stark

Counsel to the Columbia Industrial Intervenors

Enclosure

c: Administrative Law Judge Katrina L. Dunderdale (via email)  
Dan Pallas, Legal Assistant to ALJ (via email)  
Certificate of Service

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## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

### VIA E-MAIL

Michael W. Hassell Esq.  
Lindsay A. Berkstresser Esq.  
Post & Schell PC  
17 North Second Street 12th Floor  
Harrisburg, PA 17101-1601  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[lberkstresser@postschell.com](mailto:lberkstresser@postschell.com)  
*Representing Columbia Gas of PA, Inc.*

Meagan Bielanin Moore, Esq.  
NiSource Corporate Services Co.  
121 Champion Way, Suite 100  
Canonsburg, PA 15317  
[mbielanin@nisource.com](mailto:mbielanin@nisource.com)  
*Representing Columbia Gas of PA, Inc.*

Amy E. Hirakis Esq.  
NiSource Corporate Services Co.  
800 North 3rd Street Ste 204  
Harrisburg, PA 17102 Pa 18101  
[ahirakis@nisource.com](mailto:ahirakis@nisource.com)  
*Representing Columbia Gas of PA, Inc.*

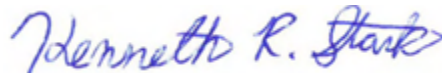
Laura Antonucci Esq.  
Barrett Sheridan Esq.  
Darryl Lawrence Esq.  
Office of Consumer Advocate  
Forum Place 5th Floor  
555 Walnut Street  
Harrisburg, PA 17101-1923  
[LAntonucci@paoca.org](mailto:LAntonucci@paoca.org)  
[DLawrence@Paoca.Org](mailto:DLawrence@Paoca.Org)

Erika McLain Esq.  
PA PUC Bureau of Investigation and Enforcement  
400 North Street  
Harrisburg, PA 17120  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Daniel G. Asmus Esq.  
Steven Gray Esq.  
Office Small Business Advocate  
300 North Second St. Suite 202  
Harrisburg, PA 17101  
[dasmus@pa.gov](mailto:dasmus@pa.gov)  
[sgray@pa.gov](mailto:sgray@pa.gov)

Elizabeth R. Marx Esq.  
Ria M. Pereira Esq.  
John W. Sweet Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)  
[jsweetpulp@palegalaid.net](mailto:jsweetpulp@palegalaid.net)  
*Representing Cause-PA*

Joseph L. Vullo Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jvullo@bvrrlaw.com](mailto:jvullo@bvrrlaw.com)  
*Representing Community Action Association of Pennsylvania*



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Kenneth R. Stark

Counsel to the Columbia Industrial Intervenors

Dated this 2<sup>nd</sup> day of June, 2020, at Harrisburg, Pennsylvania.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	DOCKET NO. R-2020-3018835
v.	:	C-2020-3020105
	:	
COLUMBIA GAS OF PENNSYLVANIA, INC.:	:	

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**PREHEARING MEMORANDUM OF  
THE COLUMBIA INDUSTRIAL INTERVENORS**

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Pursuant to Administrative Law Judge ("ALJ") Katrina L. Dunderdale's May 22, 2020, Prehearing Conference Order, the Columbia Industrial Intervenors ("CII") hereby submit this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On April 24, 2020, Columbia Gas of Pennsylvania, Inc. ("Columbia" or "Company"), filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Supplement No. 307 to Tariff Gas – Pa. P.U.C. No. 9 ("Supplement No. 307"). Supplement No. 307 requested a general rate increase of approximately \$100.4 million over the Company's present annual revenues. Columbia supplemented this request with the Direct Testimony of several witnesses, responses to filing requirements, and documentation regarding the Company's proposals.

On May 29, 2020, CII filed a Complaint in this proceeding. A description of CII is set forth in Paragraph 5 of CII's Complaint. A Prehearing Conference has been scheduled in this proceeding for June 3, 2020.

## **II. SERVICE LIST**

For purposes of this proceeding, CII will be represented by the following counsel:

Charis Mincavage (Pa. I.D. No. 82039)  
Kenneth R. Stark (Pa. I.D. No. 312945)  
McNEES WALLACE & NURICK LLC  
100 Pine Street, P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 237-5300  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)

Please direct all correspondence to the attention of Charis Mincavage; however, for purposes of electronic service lists, CII requests that both Ms. Mincavage and Mr. Stark be included on any correspondence.

## **III. ANTICIPATED ISSUES AND SUB-ISSUES**

CII's preliminary review of the Company's filing indicates the need for Commission investigation into at least the following issues:

- (a) Whether the size of the requested rate increase is appropriate;
- (b) Whether the expenses claimed by Columbia are prudently incurred;
- (c) Whether the allocation of the proposed increase among customer classes is just, reasonable, and non-discriminatory considering the cost of service study results;
- (d) Whether the return on equity proposed by Columbia results in a fair rate of return;
- (e) Whether Columbia's claimed cost of service is accurate, legitimate, and appropriately allocated; and
- (f) Whether Columbia's proposed Tariff changes result in unjust and unreasonable service for customers.

CII reserves the right to raise and address other issues of concern during the course of this proceeding.

**IV. PROPOSED WITNESSES**

CII is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that CII decides to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and topics of testimony. CII also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

**V. PROPOSED SCHEDULE AND DISCOVERY RULES**

CII will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

**VI. POSSIBILITY OF SETTLEMENT**

CII is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Charis Mincavage (Pa. I.D. No. 82039)  
Kenneth R. Stark (Pa. I.D. No. 312945)  
100 Pine Street, P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 237-5300  
[cmincavage@mcneelaw.com](mailto:cmincavage@mcneelaw.com)  
[kstark@mcneelaw.com](mailto:kstark@mcneelaw.com)

Counsel to the Columbia Industrial Intervenors

Dated: June 2, 2020