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February 24, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Keystone Cooperative Association, Inc. v. Peoples Natural Gas Company, LLC; Docket No. C-2020-3021238; **KEYSTONE COOPERATIVE ASSOCIATION, INC.'S PETITION FOR LEAVE TO WITHDRAW COMPLAINT**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is Keystone Cooperative Association, Inc.'s Petition for Leave to Withdraw Complaint in the above-captioned matter. A copy of this Petition has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Very truly yours,

Todd S. Stewart
*Counsel for
Keystone Cooperative Association, Inc.*

TSS/jld

Enclosures

cc: Deputy Chief Administrative Law Judge Joel H. Cheskis (via electronic mail)
Per Certificate of Service

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 MAIL ONLY

Jennifer L. Petrisek, Esquire
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*Counsel for Peoples Natural Gas Company,
LLC*



DATED: February 24, 2021

Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Keystone Cooperative Association, Inc. :
 :
 v. : Docket No. C-2020-3021238
 :
 Peoples Natural Gas Company, LLC :

**KEYSTONE COOPERATIVE ASSOCIATION, INC.’S
PETITION FOR LEAVE TO WITHDRAW COMPLAINT**

NOW COMES Keystone Cooperative Association, Inc., (“Keystone”), the Complainant in the above-captioned matter, and hereby Petitions the Presiding Administrative Law Judge for leave to withdraw its Complaint in this matter pursuant to 52 Pa. Code § 5.94. In support of its Petition, Keystone states and avers as follows:

1. On or about August 10, 2020, Keystone filed the above-captioned Complaint against Peoples Natural Gas Company LLC, (“Peoples”) seeking relief from Peoples’ failure to renew a 20-year contract for discounted distribution rates to Keystone’s three meters in the Windber, Pennsylvania vicinity where Keystone operates as a member-owned natural gas cooperative.

2. On or about September 8, 2020, Peoples answered the Complaint.

3. Subsequently, this matter was assigned to the Commission’s alternative dispute resolution process where the parties attempted to resolve their differences through settlement. That effort ultimately failed.

4. By Notice dated January 28, 2021, this matter was assigned to Presiding Administrative Law Judge, Joel Cheskis, and a hearing scheduled for March 9, 2021.

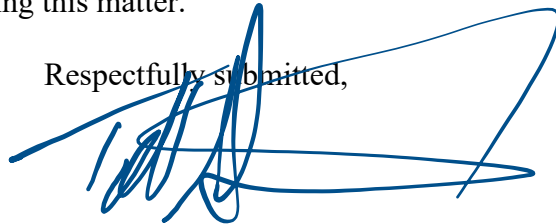
5. Throughout the course of this matter Peoples' resisted providing any sort of accommodation to Keystone after a 20-year relationship where nothing on Keystone's side of the bargain had changed, and Keystone continues to serve its Pennsylvania resident members in the Windber area. Nonetheless, Keystone has decided that the best interest of its members lies down a different path, and that it is unlikely to receive any substantial benefit through the instant litigation. Accordingly, Keystone requests that it be permitted to withdraw the instant complaint.

6. As a consequence, Keystone believes and therefore avers that its withdrawal of the above-captioned Formal Complaint is in the public interest in that it will save all parties the cost and aggravation of litigation and will allow those resources to be used elsewhere.

7. Keystone also avers that if it is permitted to withdraw its Formal Complaint, no party will be harmed.

WHEREFORE, Keystone respectfully requests that it be permitted to withdraw its Complaint and that the Honorable Presiding Administrative Law Judge issue an Order granting the withdrawal of its Formal Complaint and closing this matter.

Respectfully submitted,



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Dated: February 24, 2021