

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2021-3023965
Office of Small Business Advocate	:	C-2021-3024558
Office of Consumer Advocate	:	C-2021-3024609

v.

Peoples Natural Gas Company LLC

Pennsylvania Public Utility Commission	:	R-2021-3023967
Office of Small Business Advocate	:	C-2021-3024551
Office of Consumer Advocate	:	C-2021-3024610

v.

Peoples Gas Company LLC

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE  
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

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**To the Honorable Katrina L. Dunderdale, Administrative Law Judge:**

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and Your Honor’s Prehearing Conference Order dated April 7, 2021, the Pennsylvania Independent Oil & Gas Association (PIOGA) submits this prehearing conference memorandum.

**BRIEF HISTORY OF PROCEEDINGS**

On April 1, 2021, Peoples Natural Gas Company LLC (Peoples) and Peoples Gas Company LLC (Peoples-Gas) (collectively, “Peoples Companies”) made their annual filings pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. § 1307, and the Commission’s regulations.

The Commission's Bureau of Investigation and Enforcement (I&E) entered its appearance, and the Office of Consumer Advocate (OCA) and the Office of Small Business Advocate (OSBA) filed formal complaints and entered their appearances. PIOGA filed its petitions to intervene in these two proceedings on Tuesday, April 7, 2021.

As stated in PIOGA's petition to intervene, PIOGA's members include natural gas producers and Pennsylvania Public Utility Commission-licensed natural gas suppliers and marketers (NGSs) that produce, transport and market natural gas, including Pennsylvania Appalachian production, on the pipeline systems of the Peoples Companies for system supply and to transportation customers.

#### **SERVICE LIST**

PIOGA's entry on the service list is:

Kevin J. Moody, Esquire  
General Counsel  
Pennsylvania Independent Oil & Gas Association  
212 Locust Street, Suite 300  
Harrisburg, PA 17101-1510  
(717) 234-8525, ext. 113  
Fax: (717) 2234-8812  
[kevin@pioga.org](mailto:kevin@pioga.org)

#### **WITNESS AND SUBJECT MATTER OF TESTIMONY**

PIOGA has not yet determined whether, or whom, it may present as a witness or the specific subject matter of any testimony to address the issues identified below or the issues that may be raised by other parties.

## **ISSUES OF CONCERN**

PIOGA is concerned with: (i) the Companies' least cost fuel procurement practices, policies and methodologies, particularly how the companies treat locally produced gas from conventional formations; (ii) the companies' retainage levels and measurements; (iii) the level of producers' retainage; and (iv) the companies' practices and measures to address and mitigate lost and unaccounted for gas (LUGF). PIOGA reserves the right to identify, address and raise other issues that may affect PIOGA's interests as well as to address issues raised by other parties that may affect PIOGA's interests.

## **PROPOSED LITIGATION SCHEDULE**

PIOGA has agreed to the Peoples Companies' proposed litigation schedule.

## **MODIFICATION OF DISCOVERY RULES**

PIOGA is amenable to reasonable modifications to the Commission's discovery rules as has become customary to accommodate reduced response times and email service and other concerns that arise.

Respectfully submitted,



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Kevin J. Moody, Esquire  
I.D. No. 34367  
General Counsel  
Pennsylvania Independent Oil & Gas Association  
212 Locust Street, Suite 300  
Harrisburg, PA 17101-1510  
(717) 234-8525  
Fax: (717) 2234-8812

Dated: April 8, 2021

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of PIOGA's Prehearing Memorandum in the above referenced proceedings upon the Presiding Officer and parties listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a party)

### **VIA EMAIL only**

KATRINA L. DUNDERDALE  
ADMINISTRATIVE LAW JUDGE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PIATT PLACE  
SUITE 220  
301 5TH AVENUE  
PITTSBURGH, PA 15222  
[kdunderdal@pa.gov](mailto:kdunderdal@pa.gov)

MICHAEL W GANG ESQUIRE  
MICHAEL W HASSELL ESQUIRE  
NICHOLAS A STOBBE ESQUIRE  
POST & SCHELL PC  
17 NORTH SECOND STREET  
12TH FLOOR  
HARRISBURG PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[NStobbe@PostSchell.com](mailto:NStobbe@PostSchell.com)  
*Representing Peoples Companies*

WILLIAM H ROBERTS II ESQUIRE  
ANDREW WACHTER  
CAROL SCANLON  
PNG COMPANIES LLC  
375 NORTH SHORE DRIVE  
PITTSBURGH PA 15212  
[william.h.robertsii@peoples-gas.com](mailto:william.h.robertsii@peoples-gas.com)  
[andrew.wachter@peoples-gas.com](mailto:andrew.wachter@peoples-gas.com)  
[carol.scanlon@peoples-gas.com](mailto:carol.scanlon@peoples-gas.com)

ALLISON C KASTER RATE COUNSEL  
PA PUC BIE LEGAL TECHNICAL  
SECOND FLOOR WEST  
400 NORTH STREET  
HARRISBURG PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

DAVID T EVRARD ESQUIRE  
ARON J BEATTY, ESQUIRE  
OFFICE OF CONSUMER ADVOCATE  
5TH FLOOR FORUM PLACE  
555 WALNUT STREET  
HARRISBURG PA 17101  
[DEvrard@paoca.org](mailto:DEvrard@paoca.org)  
[ABeatty@paoca.org](mailto:ABeatty@paoca.org)

ERIN FURE, ESQUIRE  
JOHN R EVANS, ESQUIRE  
OFFICE SMALL BUSINESS ADVOCATE  
555 WALNUT ST  
1<sup>ST</sup> FLOOR, FORUM PLACE  
HARRISBURG PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)  
[jorevan@pa.gov](mailto:jorevan@pa.gov)



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Kevin J. Moody, Esquire  
General Counsel, PIOGA

Date: April 8, 2021