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April 16, 2021

**VIA ELECTRONIC FILING**

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

RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.;  
Docket No. R-2021-3024296; **PETITION TO INTERVENE OF SHIPLEY  
CHOICE, LLC AND INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Shipley Choice, LLC, and Interstate Gas Supply, Inc. d/b/a IGS Energy (the "NGS Parties") in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
*Counsel for Shipley Choice, LLC d/b/a  
Shipley Energy and Interstate Gas Supply,  
Inc. d/b/a IGS Energy ("IGS") (the "NGS  
Parties")*

TSS/jld  
Enclosure  
cc: 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

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DATED: April 16, 2021

Todd S. Stewart

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
	:	
v.	:	Docket No. R-2021-3024296
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**PETITION TO INTERVENE  
OF SHIPLEY CHOICE LLC, AND  
INTERSTATE GAS SUPPLY, INC.**

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NOW COMES Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”) and Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) (collectively “NGS Parties”), and hereby petition the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding pursuant to 52 Pa. Code §5.71. *et. seq.* As discussed more fully below, the NGS Parties are licensed natural gas suppliers (“NGS”) providing natural gas supply service using the jurisdictional facilities of Columbia Gas of Pennsylvania, Inc. (the “Company”) or (“Columbia”). In support of their Petition to Intervene, the NGS Parties state and aver as follows:

1. On or about March 29, 2021, Columbia Gas of Pennsylvania, Inc. (“Columbia”) filed with the Commission a request to increase base rates by \$98.3 million.
2. The NGS Parties, both of which are licensed natural gas suppliers providing service in the Columbia of Pennsylvania service territory, are represented in the above-captioned matter by the following counsel:

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3. The NGS Parties currently serve customers throughout the spectrum of customer classes on the Columbia system, including residential, commercial and industrial customers. As such, they have a direct and immediate interest in any modifications to any tariff which could impact their ability to serve those customers and they have a clear interest in any tariff provisions, whether new or existing, that directly have impacted their ability to reasonably and fairly serve customers on the Columbia system.

4. Among other aspects of the filing, Columbia proposes increases to the rates for Riders GPC and MFC. The NGS' Parties' primary concern, however, is Columbia's reaction to the recent events prompted by the currently pending FERC rate case of Columbia Gas Transmission ("TCO") and TCO's proposed and now effective balancing requirements. TCO delivers about 80% of Columbia's design day supply and so any changes, let alone the new and drastic changes in its transport requirements will, in turn, almost certainly impose new requirements for suppliers serving customers on the Columbia system.

5. The scope and substance of any adjustments that Columbia might seek to impose as a consequence of the resolution of the TCO rate case are the primary concern of the NGS Parties. However, the NGS Parties are still completing their final review of the rate filing and have not yet taken any specific positions on any other issues. The NGS Parties will be prepared to state their other positions more fully at the time of the prehearing conference.

6. Because the NGS Parties serve customers on the Columbia system, where they are licensed and serve significant numbers of customers; they have a direct and immediate interest that is substantial and cannot be represented by any other party to this proceeding. Moreover, the NGS Parties clearly will be bound by any decision that the Commission might make about Columbia's requested rate increase and any accompanying tariff changes. Therefore, the NGS Parties request that their intervention be granted and that they be allowed full party status in this matter.

**WHEREFORE,** the NGS Parties hereby request that the Pennsylvania Public Utility Commission grant their Petition to Intervene in the above-captioned matter and request full party status.

Respectfully submitted,



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Shipley Energy and Interstate Gas Supply,  
Inc. d/b/a IGS Energy ("IGS") (the "NGS  
Parties")*

DATED: April 16, 2021