



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

May 5, 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; **AMENDED PETITION TO INTERVENE OF
SHIPLEY CHOICE, LLC AND THE RETAIL ENERGY SUPPLY
ASSOCIATION**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Amended Petition to Intervene of Shipley Choice, LLC, and the Retail Energy Supply Association (collectively "Shipley/RESA") in the above-captioned docket. Copies of this Amended 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,

A handwritten signature in blue ink, appearing to read 'Todd S. Stewart', is written over the words 'Very truly yours,'.

Todd S. Stewart
*Counsel for Shipley Choice, LLC d/b/a
Shipley Energy and the Retail Energy Supply
Association*

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

Michael W. Hassell, Esquire
Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Fl.
Harrisburg, PA 17101
mhassell@postschell.com
lberkstresser@postschell.com
Counsel for Columbia Gas of Pennsylvania, Inc.

Amy E. Hirakis, Esquire
Columbia Gas of Pennsylvania, Inc.
800 North 3rd Street, Suite 204
Harrisburg, PA 17102
ahirakis@nisource.com
Counsel for Columbia Gas of Pennsylvania, Inc.

Theodore J. Gallagher, Esquire
Columbia Gas of Pennsylvania, Inc.
121 Campion Way, Suite 100
Canonsburg, PA 15317
tjgallagher@nisource.com
Counsel for Columbia Gas of Pennsylvania, Inc.

John W. Sweet, Esquire
Ria M. Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrirlaw.com
*Counsel for Pennsylvania Weatherization
Providers Task Force*

Laura J. Antinucci
Barrett C. Sheridan
Harrison W. Breitman
Christy M. Appleby
Darryl A. Lawrence
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
LAntinucci@paoca.org
BSheridan@paoca.org
HBreitman@paoca.org
CAappleby@paoca.org
DLawrence@paoca.org

Steven C. Gray, Senior Supervising
Assistant Small Business Advocate
Commonwealth of Pennsylvania
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov

Erika L. McLain, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ermclain@pa.gov



DATED: May 5, 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.	:	

**AMENDED PETITION TO INTERVENE
OF SHIPLEY CHOICE, LLC AND
THE RETAIL ENERGY SUPPLY ASSOCIATION**

NOW COMES Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”) and the Retail Energy Supply Association (“RESA”)(collectively “Shipley/RESA”), 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, Shipley is a licensed natural gas supplier (“NGS”) providing natural gas supply service using the jurisdictional facilities of Columbia Gas of Pennsylvania, Inc. (the “Company”) or (“Columbia”), and RESA is a trade association that has members that are NGSs and which represents the interests of its members.¹ In support of their Joint Petition to Intervene, Shipley/RESA state and aver as follows:

¹ The positions expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

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. On or about April 16, 2021, Shipley and Interstate Gas Supply, Inc. (“IGS”) filed a Petition to Intervene in this matter. The purpose of this Amendment is to remove IGS individually from the Petition to Intervene and to substitute RESA in its place. Shipley is a licensed natural gas supplier providing service in the Columbia of Pennsylvania service territory; RESA is a trade association that represents the interests of natural gas suppliers before the Commission. Shipley/RESA are represented in the above-captioned matter by the following counsel:

Todd S. Stewart
Attorney I.D. No. 75556
Hawke McKeon & Sniscak LLP
100 N. Tenth Street
Harrisburg, PA 17101
Phone: (717) 236-1300
Fax: (717) 236-4841
Email: tsstewart@hmslegal.com

3. Both Shipley and RESA members currently serve customers throughout the spectrum of customer classes on the Columbia system, including residential, commercial and industrial customers.² As such, Shipley and RESA 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. Shipley/RESA’s primary concern, however, is Columbia’s reaction to the recent events prompted by the currently pending FERC rate case of Columbia Gas Transmission

² A list of RESAs members is available at: <http://www.resausa.org/members>.

(“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. While 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 Shipley/RESA, Shipley/RESA are still completing their final review of the rate filing and have not yet taken any specific positions on any other issues. Shipley/RESA will be prepared to state any other positions more fully at the time of the prehearing conference.

6. Because both Shipley and RESA members are NGSs operating 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, and they clearly will be bound by any decision that the Commission might make about Columbia’s requested rate increase and any accompanying tariff changes. RESA also has an independent interest as an association representing natural gas suppliers to ensure that tariffs and rules for all NGDCs in the Commonwealth are conducive to fair and effective competition. Therefore, Shipley and RESA request that their joint intervention be granted and that they be allowed full party status in this matter.

WHEREFORE, Shipley and RESA hereby petition the Pennsylvania Public Utility Commission to intervene in the above-captioned matter and request full party status.

Respectfully submitted,



Todd S. Stewart
PA Attorney I.D. #75556
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
E-mail: tsstewart@hmslegal.com
Telephone: (717) 236-1300
Facsimile: (717) 236-4841

*Counsel for Shipley Choice, LLC d/b/a
Shipley Energy and the Retail Energy Supply
Association*

DATED: May 5, 2021