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May 11, 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; **PREHEARING CONFERENCE**
MEMORANDUM OF SHIPLEY CHOICE, LLC AND THE RETAIL
ENERGY SUPPLY ASSOCIATION

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of Shipley Choice, LLC and the Retail Energy Supply Association (collectively "Shipley/RESA") in the above-captioned docket. Copies of this Memorandum 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', with a large, stylized flourish extending from the end of the signature.

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

TSS/jld/
Enclosure

cc: Deputy Chief Administrative Law Judge Mark A. Hoyer (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

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DATED: May 11, 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.	:	

**PREHEARING CONFERENCE MEMORANDUM
OF SHIPLEY CHOICE LLC AND
THE RETAIL ENERGY SUPPLY ASSOCIATION**

TO THE HONORABLE MARK A HOYER

Pursuant to the Prehearing Order dated May 10, 2021 in the above-captioned matter and the Commission’s regulations at 52 Pa. Code §5.221, *et seq.*, Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”) and the Retail Energy Supply Association (“RESA”) (collectively “Shipley/RESA”), hereby submit their Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On or about March 30, 2021, Columba Gas of Pennsylvania, Inc. (“Columbia” or “Company”) filed a Supplement No. 325 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 267”) seeking to increase operating revenues by approximately \$98.3 million, or approximately 14.49%.

2. By Order dated May 6, 2021, the Pennsylvania Public Utility Commission (“Commission”) suspended the effective date of the tariff until December 29, 2021.

3. On May 5, 2021, Shipley/RESA petitioned to intervene in the above-captioned proceeding, amending a Petition to Intervene filed by Shipley and Interstate Gas Supply, Inc.(“IGS”), on April 16, 2021, by substituting RESA in place of IGS.

II. EXPECTED ISSUES

4. Shipley/RESA intend primarily to address changes to Columbia's procedures, and tariffed processes, particularly balancing, as a consequence of a Columbia Gas Transmission ("TCO") rate case currently pending before the Federal Energy Regulatory Commission at Docket No. RP20-1060-001, *et al.* In that case, certain requirements already have been implemented subject to refund. These new requirements have the potential to greatly increase the difficulty of scheduling on the TCO pipeline system, and thus increase the risk of Columbia being penalized by TCO and in turn seeking to pass that risk on to NGSs operating on its system. Shipley/RESA intend to focus their participation in this matter on ensuring that any changes proposed in this matter are just and reasonable for all parties.

III. PROPOSED WITNESSES

5. Shipley/RESA have not yet identified any witnesses for this matter but will do so and provide notice to Your Honor and the other parties at the earliest possible time. Shipley/RESA reserve the right to offer additional witnesses as necessitated by the issues.

IV. LITIGATION SCHEDULE

6. Shipley/RESA are committed to working with the other parties and Your Honor to develop a schedule that meets all the parties' needs.

V. DISCOVERY

7. Shipley/RESA will have submitted at least one set of discovery as of the date of this Prehearing Memorandum but will endeavor to engage the process efficiently and complete their initial discovery as early as possible. Shipley/RESA will work cooperatively with the Company and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judge. Moreover, Shipley/RESA would not object

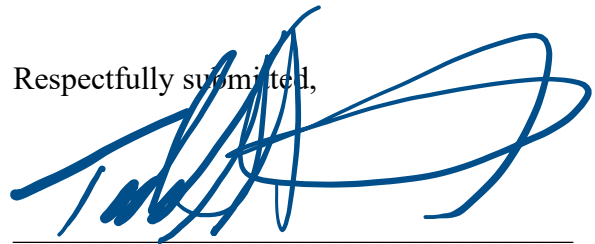
to the typical discovery modifications proposed by the Office of Consumer Advocate in cases such as this.

VI. SETTLEMENT

8. Shipley/RESA are willing to engage in settlement discussions with any and all parties at any time during this proceeding and welcome the opportunity to do so at the earliest possible date.

WHEREFORE, Shipley/RESA respectfully submit this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Monday, May 17, 2021 at 10:00 am.

Respectfully submitted,



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DATED: May 11, 2021