



Thomas J. Sniscak  
(717) 236-1300 x224  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)

Whitney E. Snyder  
(717) 236-1300 x260  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

Bryce R. Beard  
(717) 236-1300 x248  
[brbeard@hmslegal.com](mailto:brbeard@hmslegal.com)

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100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

May 14, 2021

**BY ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.;  
Docket Nos. R-2021-3024296 & C-2021-3025775; **THE PENNSYLVANIA  
STATE UNIVERSITY'S PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is The Pennsylvania State University's Prehearing Conference Memorandum in connection with the above-captioned docket. Copies of this document have been served in accordance with the attached Certificate of Service. This document is filed and served electronically pursuant to the COVID-19 Suspension Emergency Order dated March 20, 2020 and ratified March 26, 2020.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,

*/s/ Whitney E. Snyder*

Thomas J. Sniscak  
Whitney E. Snyder  
Bryce R. Beard

*Counsel for The Pennsylvania State University*

TJS/WES/das

Enclosure

cc: Per Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3024296
	:	
Columbia Gas of Pennsylvania, Inc.	:	
	:	
The Pennsylvania State University	:	
	:	
v.	:	Docket No. C-2021-3025775
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**THE PENNSYLVANIA STATE UNIVERSITY’S  
PREHEARING CONFERENCE MEMORANDUM**

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**TO: DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE MARK A. HOYER:**

On May 7, 2021, a Notice was issued by the Pennsylvania Public Utility Commission (“Commission”) setting a Telephonic Prehearing Conference in the above-captioned proceeding for Monday, May 17, 2021 at 10:00 a.m. before Deputy Chief Administrative Law Judge (“ALJ”) Mark A. Hoyer. On May 10, 2021, ALJ Hoyer issued a Prehearing Conference Order requiring each party to file a Prehearing Conference Memorandum on or before May 14, 2021.

The Pennsylvania State University (“PSU”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Conference Memorandum.

## **I. ACCEPTANCE OF SERVICE**

Service of paper documents in this proceeding shall be accepted on behalf of PSU by:

Thomas J. Sniscak, Attorney I.D. No. 33891  
Whitney E. Snyder, Attorney I.D. No. 316625  
Bryce R. Beard, Attorney I.D. No. 325837  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[brbeard@hmslegal.com](mailto:brbeard@hmslegal.com)

Counsel for PSU also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak ([tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)), Whitney E. Snyder ([wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)) and Bryce R. Beard ([brbeard@hmslegal.com](mailto:brbeard@hmslegal.com)). PSU is willing to extend the same courtesy upon request of any other party for any e-mails or electronic service to the parties.

## **II. SETTLEMENT**

There have been no settlement discussions to date, but PSU is willing to participate in settlement discussions with the other parties.

## **III. DISCOVERY**

PSU takes no position on modification of the discovery schedule at this time but is willing to work with the parties on mutually agreeable modifications.

## **IV. SCHEDULE**

PSU is working with the other parties to develop a mutually satisfactory schedule for consideration by Your Honor at the Prehearing Conference.

## V. WITNESSES

PSU reserves the right to offer the Direct Testimony of James L. Crist in support of its positions. Mr. Crist's business address, telephone number and e-mail address are:

James L. Crist  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
(412) 487-9708  
[JLCrist@aol.com](mailto:JLCrist@aol.com)

PSU requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted (other than Columbia's initial filing materials) be e-mailed directly to Mr. Crist at [JLCrist@aol.com](mailto:JLCrist@aol.com).

If called, Mr. Crist may present testimony regarding the revenue required by the Company and the allocation of that revenue between customer classes, along with the rate design and operational requirements of specific rate schedules and also may present testimony in response to testimony or exhibits offered by any other party. Mr. Crist may also present testimony concerning the Company's proposed Gas Procurement Charge, Cost of Service Studies, and potential changes in the requirements the Company imposes on customers that procure gas from alternative suppliers and Columbia's potential modification of its transportation regulations.

Mr. Crist reserves his right to also present testimony on any further issue that may arise as a result of further review of the filing, discovery or testimony or any position taken by any other party to this proceeding.

Additionally, PSU may offer the direct testimony of a member of its Office of Physical Plant - Energy and Engineering Division regarding issues created or raised by the filing and its offered supporting information and the issues described. PSU reserves the right to present additional witnesses should its discovery or its review of responses to the discovery of other parties raise additional issues.

PSU reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

## **VI. ISSUES**

At this juncture, and subject to discovery and issues raised by PSU and by other parties, PSU intends to address the issue of whether the service PSU takes under certain rate categories may be burdened with a disproportionate share of the overall increase requested and whether the Company's cost allocations and multiple Cost of Service Studies appear to be unreasonable and discriminatory as is the proposed distribution of its recommended revenue requirement.

Furthermore, the Company's proposed Gas Procurement Charge must be examined to determine if the costs allocated are appropriate and to determine if it serves to place Columbia's own system supply gas in a more favorable position. Additionally, potential changes in the requirements the Company imposes on customers that procure gas from alternative suppliers and Columbia's potential modification of its transportation regulations must be monitored and potentially addressed in this proceeding.

PSU's position will be finalized in its evidence and briefs submitted under the schedule developed in this case.

## **VII. EVIDENCE**

PSU reserves the right to submit pre-filed direct testimony and associated exhibits addressing the issues identified in the preceding section. PSU may also present additional testimony and exhibits after discovery or in response to testimony or exhibits introduced by any party or witness in this proceeding.

WHEREFORE, The Pennsylvania State University respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

/s/ Whitney E. Snyder

Thomas J. Sniscak, Attorney I.D. No. 33891  
Whitney E. Snyder, Attorney I.D. No. 316625  
Bryce R. Beard, Attorney I.D. No. 325837  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
tjsniscak@hmslegal.com  
wesnyder@hmslegal.com  
brbeard@hmslegal.com

*Counsel for The Pennsylvania State University*

Dated: May 14, 2021

## **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, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[lberkstresser@postschell.com](mailto:lberkstresser@postschell.com)

*Counsel for  
Columbia Gas of Pennsylvania, Inc.*

Nicole M. Paloney, Esquire  
Theodore J. Gallagher, Esquire  
Columbia Gas of Pennsylvania, Inc.  
Southpointe Industrial Park  
121 Champion Way, Suite 100  
Canonburg, PA 15317  
[npaloney@nisource.com](mailto:npaloney@nisource.com)  
[tjgallagher@nisource.com](mailto:tjgallagher@nisource.com)

Amy E. Hirakis, Esquire  
NiSource Corporate Services Co.  
800 North Third Street, Suite 204  
Harrisburg, PA 17102  
[ahirakis@nisource.com](mailto:ahirakis@nisource.com)

*Counsel for  
Columbia Gas of Pennsylvania, Inc.*

Steven Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Barret C. Sheridan, Esquire  
Christy Appleby, Esquire  
Darryl A. Lawrence, Esquire  
Harrison W. Breitman, Esquire  
Laura J. Antinucci, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[bsheridan@paoca.org](mailto:bsheridan@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)  
[lantinucci@paoca.org](mailto:lantinucci@paoca.org)

David J. Effron  
Berkshire Consulting Services  
12 Pond Path  
North Hampton, NH 03862  
[OCAColumbiaGas2021@paoca.org](mailto:OCAColumbiaGas2021@paoca.org)

Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

*Counsel for CAUSE-PA Intervenor*

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for NGS Parties, Shipley Energy and  
the Retail Energy Supply Association*

Erika L. McLain, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

*Counsel for Community Action Association of  
Pennsylvania and Pennsylvania  
Weatherization Providers Task Force*

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Pkwy, Suite 300  
Columbia, MD 21044-3575  
[OCAColumbiaGas2021@paoca.org](mailto:OCAColumbiaGas2021@paoca.org)

Charis Mincavage, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street, P.O. Box 1166  
Harrisburg, PA 17108  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)

*Counsel for  
Columbia Industrial Intervenor*

Robert D. Knecht  
Industrial Economics, Inc.  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)

/s/ Whitney E. Snyder

Thomas J. Sniscak  
Whitney E. Snyder  
Bryce R. Beard

Dated this 14<sup>th</sup> day of May, 2021