
Nicholas A. Stobbe

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File #: 182459

May 28, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: PA Public Utility Commission v. Peoples Gas Company LLC
Docket Nos. R-2021-3023967, et al.

Dear Secretary Chiavetta:

Enclosed please find Peoples Gas Company LLC's Joint Stipulation for Admission of Evidence for filing in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/jl
Enclosures

cc: Certificate of Service
Honorable Katrina L. Dunderdale

CERTIFICATE OF SERVICE

(Docket Nos. R-2021-3023967, et al.)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL ONLY

David Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
devrard@paoca.org
abeatty@paoca.org

Erin K. Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
efure@pa.gov

Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
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akaster@pa.gov

Kevin J. Moody, Esquire
Vice President and General Counsel
Pennsylvania Independent Oil & Gas
Association
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510
kevin@pioga.org

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720 T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
jmierzwa@exeterassociates.com



Date: May 28, 2021

Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

JOINT STIPULATION FOR ADMISSION OF EVIDENCE

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

Peoples Gas Company LLC (“Peoples Gas” or the “Company”), the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”), all parties in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners”),¹ hereby submit this Joint Stipulation for Admission of Evidence in the above-captioned proceeding (the “Evidence Stipulation”).

Specifically, the Joint Petitioners request that Administrative Law Judge Katrina L. Dunderdale (“ALJ”) admit the testimony and the exhibits listed below into the record in the above-captioned consolidated proceeding:

I. PEOPLES GAS’S TESTIMONY AND EXHIBITS

1. The Company’s 30-day 1307(f) pre-filing, which will be admitted as Peoples Gas Exhibit No. 17.
2. The Company’s definitive 1307(f) filing, which included:

¹ The Pennsylvania Independent Oil & Gas Association (“PIOGA”) did not submit any testimony and exhibits in this proceeding. PIOGA has indicated that it does not oppose the Joint Stipulation for Admission of Evidence.

- a) Peoples Gas Statement No. 1 – Direct Testimony of Carol A. Scanlon. This witness sponsored or jointly sponsored, as part of the Company’s definitive filing, **Peoples Gas Exhibit No. 3**
- b) Peoples Gas Statement No. 2 – Direct Testimony of Steven P. Kolich. This witness sponsored or jointly sponsored, as part of the Company’s definitive filing, **Peoples Gas Exhibit Nos. 1, 4, 5, 8, 9, and 10.**
- c) Peoples Gas Statement No. 3 – Direct Testimony of Robert Waruszewski. This witness sponsored or jointly sponsored, as part of the Company’s definitive filing, **Peoples Gas Exhibit Nos. 6, 7, 8, 9, 10, 11, 12, 13, and 14.**
- d) Peoples Gas Statement No. 4 – Direct Testimony of Jason M. Dalton. This witness sponsored or jointly sponsored, as part of the Company’s definitive filing, **Peoples Gas Exhibit Nos. 1 and 2.** Peoples Gas notes that Mr. Dalton’s correct job title is Finance and Rates Analyst “IV,” not Finance and Rates Analyst “V,” as titled in Peoples Gas Statement No. 4.
- e) Peoples Gas Statement No. 5 – Direct Testimony of Lynda W. Petrichevich. This witness sponsored or jointly sponsored, as part of the Company’s definitive filing, **Peoples Gas Exhibit Nos. 15 and 16.**
- f) Peoples Gas **CONFIDENTIAL** Exhibit No. 6, made available to parties who executed a Stipulated Protective Agreement and filed with the Secretary concurrently with the 1307(f) definitive filing, will be submitted after a Protective Order has been entered in this proceeding. A Motion for Protective Order will be filed concurrently with the instant filing.

3. Peoples Gas Statement No. 1-R – Rebuttal Testimony of Carol A. Scanlon, including **Peoples Gas Exhibit No. 1-R and 2-R.**

4. Peoples Gas Statement No. 2-R – Rebuttal Testimony of Steven P. Kolich

II. I&E’S TESTIMONY AND EXHIBITS

5. I&E Statement No. 1 – Direct Testimony of Ethan H. Cline, including I&E Exhibit No. 1.

III. OCA’S TESTIMONY AND EXHIBITS

6. OCA Statement No. 1 – Direct Testimony of Jerome D. Mierzwa, including OCA Schedules JDM-1.

7. Verifications for Peoples Gas’s and I&E’s testimony and exhibits are attached hereto as **Appendix A**, whereas OCA’s witness verification was attached to his pre-served testimony.

8. The admission by stipulation of the foregoing testimony and exhibits is subject to Commission approval of the Joint Petition for Settlement to be filed by June 22, 2021. The Joint Petitioners reserve their respective rights to submit additional testimony and to cross-examine witnesses in the event the Joint Petition for Settlement is not approved.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judge Katrina L. Dunderdale admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,



Date: May 28, 2021

Michael W. Hassell, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

William H. Roberts II, Esquire
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212

For Peoples Gas Company LLC

Date: _____

David T. Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

For Office of Consumer Advocate

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judge Katrina L. Dunderdale admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,

Date: _____

Michael W. Hassell, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

William H. Roberts II, Esquire
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212

For Peoples Gas Company LLC



Date: 5/28/2021

David T. Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

For Office of Consumer Advocate

Allison C Kaster

Allison C. Kaster, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Date: 5/27/2021

For Bureau of Investigation and Enforcement

Erin K. Fure, Esquire
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: _____

For Office of Small Business Advocate

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510

Date: _____

For Pennsylvania Independent Oil & Gas Association

Allison C. Kaster, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Date: _____

For Bureau of Investigation and Enforcement

Erin K. Fure

Erin K. Fure, Esquire
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: May 28,2021

For Office of Small Business Advocate

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510

Date: _____

*For Pennsylvania Independent Oil & Gas
Association*

Allison C. Kaster, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

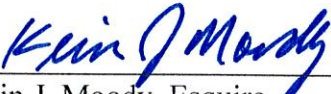
Date: _____

For Bureau of Investigation and Enforcement

Erin K. Fure, Esquire
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: _____

For Office of Small Business Advocate



Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street, Suite 300
Harrisburg, PA 17101-1510

Date: 5/28/2021

*For Pennsylvania Independent Oil & Gas
Association*

Appendix “A”

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3023967
	:	
	:	
Peoples Gas Company LLC	:	

**VERIFICATION OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

I, Ethan Cline, on behalf of the Bureau of Investigation and Enforcement, hereby verify that the documents preliminarily identified as I&E Statement No. 1 and I&E Exhibit No. 1 were prepared by me or under my direct supervision and control. Furthermore, the facts contained therein are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at an Evidentiary Hearing in this matter. This Verification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

/s/ Ethan Cline
Ethan Cline
Fixed Utility Valuation Engineer
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement

Dated: May 20, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

VERIFICATION

I, Jason M. Dalton, being Finance and Rates Analyst IV for PNG Companies LLC, hereby state that the testimony set forth in Peoples Gas Statement No. 4 is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring Peoples Gas Exhibit Nos. 1 and 2 and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2021



Jason M. Dalton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

VERIFICATION

I, Steven P. Kolich, being Director, Gas Supply for PNG Companies LLC, hereby state that the testimony set forth in Peoples Gas Statement Nos. 2 and 2-R is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring Peoples Gas Exhibit Nos. 1, 4, 5, 8, 9, and 10 and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2021



Steven P. Kolich

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

VERIFICATION

I, Lynda W. Petrichevich, being Senior Director, Process Operations for PNG Companies LLC, hereby state that the testimony set forth in Peoples Gas Statement No. 5 is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring Peoples Gas Exhibit Nos. 15 and 16 and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2021


Lynda W. Petrichevich

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

VERIFICATION

I, Carol A. Scanlon, being Manager, Rates for PNG Companies LLC, hereby state that the testimony set forth in Peoples Gas Statement Nos. 1 and 1-R is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring Peoples Gas Exhibit Nos. 3, 1-R, and 2-R and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2021


Carol A. Scanlon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2021-3023967
Office of Consumer Advocate	:		C-2021-3024551
Office of Small Business Advocate	:		C-2021-3024610
	:		
v.	:		
	:		
Peoples Gas Company LLC	:		

VERIFICATION

I, Robert Waruszewski, being Finance and Rates Analyst III for PNG Companies LLC, hereby state that the testimony set forth in Peoples Gas Statement No. 3 is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring Peoples Gas Exhibit Nos. 6, 7, 8, 9, 10, 11, 12, 13, and 14 and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2021

Robert Waruszewski

Robert Waruszewski