|  |  |  |  |
| --- | --- | --- | --- |
| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | | **IN REPLY PLEASE REFER TO OUR FILE** |
|  |  |  | |

August 5, 2021

# Docket No. P-2021-3025909

# Utility Code: 121850

GARRET P. LENT

POST & SCHELL, P.C.

17 NORTH SECOND STREET, 12TH FLOOR

HARRISBURG, PA 17101-1601

**RE: Petition of National Fuel Gas Distribution Corporation**

Dear Mr. Lent:

On May 17, 2021, the National Fuel Gas Distribution Corporation (NFG) filed a Petition that was accepted for filing and docketed with the Public Utility Commission. For us to complete our analysis of the Petition, the Public Utility Commission requires answers to the attached question(s).

Please e-file responses, referencing Docket No. P‑2021‑3025909, to the Secretary of the Commission **within seven (7) days of the date of this letter**. In accordance with the Commission’s Emergency Order at M-2020-3019262, all parties participating in matters pending before the Commission are required to e-file their submissions by opening an e-filing account - free of charge - through our website and accepting e-service. See the Commission’s website at <http://www.puc.pa.gov/efiling/default.aspx> for information on e-filing. A list of document types that may be e-filed can be found on the Commission’s website at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. CONFIDENTIAL MATERIAL CANNOT BE E-FILED. If confidential material needs to be filed, it may be emailed directly to the Secretary at [rchiavetta@pa.gov](mailto:rchiavetta@pa.gov).

**Your answers should be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter.  I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the application, please also e-mail the information to Marc Hoffer at [mhoffer@pa.gov](mailto:mhoffer@pa.gov). Please direct any questions to Marc Hoffer, Bureau of Technical Utility Services, at [mhoffer@pa.gov](mailto:mhoffer@pa.gov) (preferred) or (717) 787-1869.

**** Sincerely,

Rosemary Chiavetta

Secretary

Enclosure

Docket No. P-2021-3025909

National Fuel Gas Distribution Corporation Petition

Data Request

TUS -1. Appendix D of the Petition indicates that the Amortization of Unprotected Excess Deferred Taxes totals $1,032,645. However, in the TCJA Reconciliation Filing for the 3 months ended 9/30/18 (Docket No. M-2019-3007596) Amortization of Unprotected Excess Deferred Taxes totaled $957,600. Explain why these amounts are different and whether the amount proposed in this Petition is appropriate.

TUS -2. Provide actual monthly revenues for fiscal year 2018 to provide a basis for the allocation of revenue requirement of the Petition.

TUS -3. Provide an interest calculation utilizing the same methodology as NFG used in the TCJA Reconciliation Filing at Docket No. M-2021-3023945.