


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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October 5, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: National Fuel Gas Distribution Corporation
Supplement No. 228 to Tariff Gas -- Pa.
P.U.C. No. 9
Docket No. R-2021-3027406

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Darryl A. Lawrence

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
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Enclosures:

cc: Office of Administrative Law Judge (**email only:** crainey@pa.gov)
Bureau of Technical Utility Services (**email only:** dsearfoorc@pa.gov, sdonnelly@pa.gov)
Office of Special Assistants (**email only:** ra-OSA@pa.gov)
Certificate of Service

*318241

CERTIFICATE OF SERVICE

Re: National Fuel Gas Distribution :
Corporation Supplement No. 228 : Docket No. R-2021-3027406
to Tariff Gas -- Pa. P.U.C. No. 9 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 5th day of October 2021.

SERVICE BY E-MAIL ONLY

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/s/ Darryl A. Lawrence
Darryl A. Lawrence
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Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: October 5, 2021
*318245

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: National Fuel Gas Distribution :
Corporation Supplement No. 228 : Docket No. R-2021-3027406
to Tariff Gas -- Pa. P.U.C. No. 9 :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code §§ 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Darryl A. Lawrence
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PA Attorney I.D. # 93682
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5th Floor, Forum Place
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Respectfully submitted,

/s/ Darryl A. Lawrence
Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Dated: October 5, 2021
*318246

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Interim Acting Consumer Advocate determined to file a Notice of Intervention to participate in proceedings before the Commission involving the Tariff filing of National Fuel Gas Distribution Corporation (NFG).

On July 22, 2021, NFG filed Supplement No. 228 to Tariff Gas - Pa. P.U.C. No. 9. In this filing, NFG is proposing to reduce base rates by \$7,704,085 in order to stop collecting Other Post-Employment Benefits (“OPEB”) expenses from customers. The Company is also proposing to refund to customers \$50,000,000 in OPEB expenses paid for by customers that are not needed for future OPEB costs. The Company is proposing to refund \$25,000,000 of this amount through a one-time bill credit and the remaining \$25,000,000 over a 5-year period (\$5,000,000 per year) through a non-reconcilable surcredit.

The Interim Acting Consumer Advocate has submitted this Intervention with the Commission in order to participate in this matter and to ensure that the interests of NFG’s ratepayers are adequately represented.