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January 24, 2022

VIA ELECTRONIC FILING

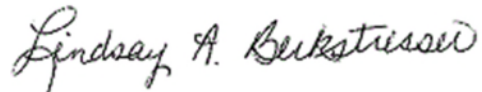
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PA Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2021-3024296**

Dear Secretary Chiavetta:

Attached for filing is the Reply of Columbia Gas of Pennsylvania, Inc., to the Petition for Reconsideration filed by Richard C. Culbertson in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Lindsay A. Berkstresser

LAB/kl

Attachment

cc: Honorable Mark A. Hoyer (*via email*)
Certificate of Service

CERTIFICATE OF SERVICE

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

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Date: January 24, 2022

A handwritten signature in cursive script, reading "Lindsay A. Berkstresser". The signature is written in dark ink and is positioned above a horizontal line.

Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No.	R-2021-3024296
Office of Consumer Advocate	:		C-2021-3025078
Office of Small Business Advocate	:		C-2021-3025257
Columbia Industrial Intervenors	:		C-2021-3025600
Pennsylvania State University	:		C-2021-3025775
Richard C. Culbertson	:		C-2021-3026054
Ronald Lamb	:		C-2021-3027217
	:		

v.

Columbia Gas of Pennsylvania, Inc.

**ANSWER OF COLUMBIA GAS OF PENNSYLVANIA, INC. TO
THE PETITION FOR RECONSIDERATION OF RICHARD C. CULBERTSON**

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I. INTRODUCTION

Columbia Gas of Pennsylvania, Inc. (“Columbia”) pursuant to 52 Pa. Code §§ 5.61 and 5.572, hereby respectfully submits this Answer to the Petition for Reconsideration (“Petition”) filed by Richard C. Culbertson on January 14, 2022. In his Petition, Mr. Culbertson seeks reconsideration of the Opinion and Order of the Pennsylvania Public Utility Commission (“Commission”) entered in the above-captioned proceeding on December 16, 2021 (“Order”).

As explained below, Mr. Culbertson’s Petition should be denied because it is untimely, fails to comply with the Commission’s regulations regarding petitions for reconsideration, and fails to meet the well-established standard for granting reconsideration set forth in Section 703(f) and (g) of the Public Utility Code, 66 Pa.C.S. § 703(f)-(g), and *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553, 559 (1982). The Petition was filed two weeks after the due date required by the Commission’s regulations and simply re-raises various arguments that were already considered and rejected by the Commission. For these reasons, and as more fully explained below, Columbia respectfully requests that the Commission deny Mr. Culbertson’s Petition for Reconsideration.

II. BACKGROUND

1. The procedural history pertinent to this Answer is set forth below. The full procedural history in this case is lengthy and is fully set forth on pages 3-4 of Columbia’s Main Brief.

2. This proceeding was initiated on March 20, 2021, when Columbia filed Supplement No. 325 to Tariff Gas Pa. P.U.C. No. 9 at Docket No. R-2021-3024296, with an effective date, after suspension, of December 29, 2021. Columbia proposed to increase overall rates by approximately \$98.3 million per year, based upon data for a Fully Projected Future Test Year ending December 31, 2022.

3. Mr. Culbertson filed a Complaint against the rate case, which was docketed at C-2021-3026054.

4. After multiple rounds of discovery, testimony and briefing, Columbia, the Office of Consumer Advocate, the Office of Small Business Advocate, Columbia Industrial Intervenors, the Pennsylvania State University, Shipley Choice, LLC and the Retail Energy Supply Association, Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania, and the Pennsylvania Weatherization Providers Task Force achieved a settlement of all issues in the case. The Joint Petition for Settlement and Statements in Support were filed on September 7, 2021.

5. The issues raised by Mr. Culbertson in this case were reserved for litigation. Consistent with that reservation of issues, a hearing was held at which Mr. Culbertson cross-examined the Company's witness. In addition, Columbia and Mr. Culbertson submitted Main Briefs on August 25, 2021, and Reply Briefs on September 7, 2021.

6. On October 5, 2021, Deputy Chief Administrative Law Judge Mark A. Hoyer issued a Recommended Decision ("RD"). The RD recommended that the Joint Petition for Settlement be approved without modification and that Mr. Culbertson's Complaint be dismissed. The RD addressed the issues raised in Mr. Culbertson's briefs and found them to be without merit.

7. On October 19, 2021, Mr. Culbertson filed Exceptions. On October 29, 2021, Columbia filed Reply Exceptions.

8. On December 16, 2021, the Commission entered an Opinion and Order adopting the RD, consistent with the Opinion and Order, and denying Mr. Culbertson's Exceptions, in major part, and granting Mr. Culbertson's Exceptions in limited part.

9. On January 14, 2022, Mr. Culbertson filed a Petition for Reconsideration of the Commission's Order. For the reasons explained below, as well as those more fully explained in the Commission's Order, Mr. Culbertson's Petition for Reconsideration should be denied.

III. LEGAL STANDARDS

10. The requirements for petitions for reconsideration of a Commission order are set forth in the Commission regulations at 52 Pa. Code § 5.572.

11. The Commission's standard for granting reconsideration following final orders is set forth in *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553, 559 (1982) (emphasis added):

A petition for reconsideration, under the provisions of 66 Pa.C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part. In this regard we agree with the Court in the Pennsylvania Railroad Company case, wherein it was said that “[p]arties ..., cannot be permitted by a second motion to review and reconsider, to raise the same questions which were specifically considered and decided against them...” What we expect to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission.

Consequently, for a petition to warrant reconsideration by the Commission, it must demonstrate new and novel arguments that were raised by the petitioner, but not previously considered by the Commission. The Commission has cautioned that the last portion of the operative language of the *Duick* standard (*i.e.*, “by the Commission”) focuses on the deliberations of the Commission, not the arguments of the parties. *See Pa. PUC v. PPL Elec. Utils. Corp.*, Docket No. R-2012-2290597,

p. 3 (Order entered May 22, 2014). Therefore, a petition for reconsideration cannot be used to raise new arguments or issues that should have been, but were not, previously raised.

12. A petition seeking relief under the *Duick* standard may properly raise any matter designed to convince the Commission that it should exercise its discretion to rescind or amend a prior order in whole or part. Importantly, however, the *Duick* standard does not permit a petitioner to raise issues and arguments considered and decided below such that the petitioner obtains a second opportunity to argue properly resolved matters. *Id.* Further, as explained by the Pennsylvania Supreme Court, petitions for reconsideration of a final agency order may only be granted judiciously and under appropriate circumstances because such action results in the disturbance of final agency orders. *City of Pittsburgh v. Pa. Dep't of Transp.*, 490 Pa. 264, 416 A.2d 461 (1980).

13. As explained below, Mr. Culbertson's Petition clearly fails to satisfy the standards for granting reconsideration and also fails to meet the requirements of the Commission's regulations.

IV. ARGUMENT

A. MR. CULBERTSON'S PETITION FOR RECONSIDERATION SHOULD BE DENIED BECAUSE IT IS UNTIMELY AND FAILS TO COMPLY WITH THE COMMISSION'S REGULATIONS REGARDING PETITIONS FOR RECONSIDERATION.

14. Mr. Culbertson's Petition for Reconsideration fails to comply with the Commission's regulations at 52 Pa. Code § 5.572.¹

¹ In his Petition, Mr. Culbertson requests a "liberal construction" because he is a *pro se* litigant. However, the Commission previously addressed Mr. Culbertson's status as a *pro se* litigant in this case. In its Opinion and Order, the Commission stated, "[w]hile Mr. Culbertson claims to be a disadvantaged *pro se* complainant in need of assistance in making his case, he at the same time repeatedly represents himself as a purported asset management expert and small business owner who had to expend funds to replace the service line at his investment property at the McFarland Property. Tr. at 59-60." *Culbertson v. Columbia Gas of Pennsylvania, Inc.*, Docket No. F-2017-2605797 (Order entered December 16, 2021), p. 13.

15. Section 5.572 requires that petitions for reconsideration be filed within “15 days after the Commission order involved is entered or otherwise becomes final.” 52 Pa. Code § 5.572(c). The Commission’s Order was entered on December 16, 2021. Therefore, any petitions for reconsideration of the Order were due by December 31, 2021. Mr. Culbertson did not file the Petition until January 14, 2022, two weeks past the due date required by the Commission’s regulations.

16. Section 5.572 also requires that petitions for reconsideration be “in numbered paragraphs.” 52 Pa. Code § 5.572(a). Mr. Culbertson’s Petition does not contain numbered paragraphs.

17. Therefore, the Petition should be denied because it is untimely and does not comply with the Commission’s regulations regarding petitions for reconsideration.

B. MR. CULBERTSON’S REQUEST FOR RECONSIDERATION SHOULD BE DENIED BECAUSE IT FAILS TO SATISFY THE *DUICK* STANDARD.

18. Mr. Culbertson raises several arguments in his Petition, all of which he previously raised before the Commission in this proceeding. As explained herein and in the Commission’s Order, all of the arguments raised in Mr. Culbertson’s Petition are not new and were previously considered and rejected by the Commission in its Order. Therefore, the Petition fails to meet the *Duick* standard for reconsideration.

19. The Commission specifically considered and rejected Mr. Culbertson’s arguments regarding his service line. In the Petition, Mr. Culbertson argues that Columbia improperly required Mr. Culbertson to replace the customer-owned portion of his service line. Petition, pp. 2, 13, 25. However, the Commission considered Mr. Culbertson’s arguments regarding his service line and determined that those issues are inappropriate for this base rate proceeding because they

are the subject of a separate complaint proceeding. The relevant portion of the Commission's Order states:

We will not consider Mr. Culbertson's claims concerning his Service Line Complaint, which is currently pending before this Commission, as these claims are more properly resolved in the Service Line Complaint proceeding.

Order, p. 48. Moreover, Mr. Culbertson claimed that he is not raising issues regarding his service line in this rate case. Specifically, Mr. Culbertson stated, “[t]his rate case is not about Culbertson and his Formal Complaint filed against Columbia Gas of Pennsylvania in May 2017. This rate case is solely about just and reasonable rates of Columbia Gas of Pennsylvania.” Culbertson Reply Brief, p. 7 (emphasis in original).

20. The Commission specifically considered and rejected Mr. Culbertson's argument that the Commission should not approve black box settlements. In Mr. Culbertson's Petition, he argues that black box settlements are inappropriate. Petition, pp. 3, 6, 14, 15, 18, 19, 23. Mr. Culbertson is attempting to re-litigate his position that the Commission should not approve a rate increase that was achieved as a result of a black box settlement. The Commission specifically rejected this position in its Order and cited to cases in which black box settlements have been approved. Order, p. 40. The Commission concluded that Mr. Culbertson's assertions regarding black box settlements are “unfounded in the law and unsubstantiated by the evidence.” See Order, pp. 36-45.

21. The Commission specifically considered and rejected Mr. Culbertson's argument that there was no investigation of Columbia's proposed rate increase. In Mr. Culbertson's Petition, he re-argues his position that an adequate investigation of Columbia's proposed rates did not occur.

Petition, pp. 4, 12, 16, 21, 23, 24. In its Order, the Commission explicitly denied Mr. Culbertson's exception on this issue. The Commission stated, in relevant part, as follows:

Upon review, we shall deny Mr. Culbertson's Exception. We find that the record demonstrates that in addition to the testimony and exhibits Columbia presented in support of its filing, Columbia's filing has been subject to an extensive and detailed investigation by eight other active Parties in this proceeding: I&E, the OCA, the OSBA, Shipley/RESA, CAUSE-PA, CII, PSU, and the Task Force. These Parties engaged in extensive discovery with the Company, had their expert witnesses review Columbia's filing and testimony, submitted direct, rebuttal, and surrebuttal testimony analyzing Columbia's case; were represented by counsel at the evidentiary hearing in this proceeding during which their various testimony and exhibits were admitted into the record, and engaged in settlement discussions that resulted in the Settlement of all of the issues in this proceeding, except those raised by Mr. Culbertson.

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[W]e conclude that the investigation conducted in this case was proper and was similar to investigations conducted in other recent Section 1308(d) general rate increase proceedings to ensure that a public utility's rates are just and reasonable. *See UGI Utilities; Pa. PUC v. Philadelphia Gas Works*, Docket No. R-2020-3017206 (Order entered November 19, 2020); *Pa. PUC v. Columbia Water Company*, Docket No. R-2017-2598203 (Order entered March 1, 2018).

Order, pp. 27-30.

22. The Commission specifically considered and rejected Mr. Culbertson's argument that Deputy Chief ALJ Hoyer should have been disqualified from presiding over this case. In his Petition, Mr. Culbertson reiterates his allegation that Deputy Chief ALJ Hoyer is biased. Petition, pp. 4, 11, 12, 14, 22, 24. The Commission considered this allegation at length and specifically rejected it as being unsubstantiated. See Order, pp. 31-36. The Commission stated:

Other than obliquely referring to an alleged prior bad prior experience with the ALJ or his own personal opinions, in his Exceptions, Mr. Culbertson refers to no evidence, in an affidavit or otherwise, of an actual or apparent impartiality or unprofessional conduct of the proceeding by the ALJ. In the Motion to Remove, Mr. Culbertson relied on the same authority cited in his Exceptions.

Further, he argued that the ALJ cannot be impartial and independent because he is a Commission employee and he has, as alleged in the motion, a nexus to other cases before the Commission, one final and one pending.

Order, p. 33. The Commission cited the standard for recusal and determined that the standard has not been met with “verified evidence” in this case. Order, pp. 33-36. The Commission concluded by stating, “[w]e find no evidence to support a conclusion that the ALJ was compromised – in actuality or in appearance.” Order, p. 35.

23. The Commission specifically considered and rejected Mr. Culbertson’s argument that the rate base of Columbia’s sister utilities in other states demonstrates that Columbia’s rate base is unreasonable. In the Petition, Mr. Culbertson once again argues that Columbia’s rate base is unreasonable in comparison to the rate base of its sister utilities in other states. Petition, p. 5. In support of his argument, Mr. Culbertson’s Petition contains the same chart that he previously presented in testimony, which compares the rate bases of Columbia’s sister utilities in other states. The Commission considered this argument and determined that it was meritless. In rejecting Mr. Culbertson’s position, the Commission stated:

Mr. Culbertson further averred that Columbia’s rates are not just and reasonable based on the size of the Company and presented an exhibit of a chart containing information on the rate bases of Columbia and its companies in Kentucky, Maryland, Ohio, Virginia, and Indiana, which are owned by the same parent company, NiSource, Inc. Culbertson St. 1 at 18, 20, 58; Culbertson Exhs. A, B. Mr. Culbertson argued that because the rates in Pennsylvania are higher than the rates in other states, this makes Columbia’s financials suspect. We have previously held that because each public utility has different problems of supply, production, distribution, competition, and geographic conditions, there need not be, and cannot be, absolute equality and uniformity of rates between utilities or between classes of service within the same utility. *Hersca v. Twin Lakes Utilities, Inc.*, Docket No. C-2020-3020883, at 14 (Order entered August 5, 2021). In this case, Columbia’s witnesses testified that rate base may differ among utilities and

jurisdictions based on differences in size, territory, number and types of customers, location of customers, and differing state and local laws. Further, this Commission has no jurisdiction to investigate rate bases of utilities outside its jurisdiction. While Columbia maintains records of its plant in service, no Party, including Mr. Culbertson, challenged any asset as imprudently constructed or at an excessive cost. *See* R. Exc. at 9; Columbia M.B. at 20-21, Columbia R.B. at 8-9. For all of these reasons, we deny Mr. Culbertson's Exception No. 4.

Order, p. 49.

24. The Commission specifically considered and rejected Mr. Culbertson's argument that the Commission does not conduct proper auditing of Columbia. In the Petition, Mr. Culbertson re-argues that the Commission has not properly audited Columbia in accordance with Constitution of the Commonwealth of Pennsylvania and the standards set forth in the United States Government Accountability Office's Yellow Book and Green Book. Petition, pp. 7, 8, 23, 24.

With respect to this issue, Commission determined as follows:

As we previously stated, these statements are not relevant to this rate proceeding because the GAO Yellow Book does not apply to the Commission's conduction of audits. Rather, the Commission conducts audits of jurisdictional public utilities pursuant to Section 516(a) of the Code, 66 Pa. C.S. § 516(a), and the Commission's Bureau of Audits is responsible for financial and management audits of such public utilities.

Order, p. 48. The Commission also stated that "Article III, Section 10 of the Pennsylvania Constitution addresses audits of entities funded or aided by the Commonwealth, including Pennsylvania agencies and institutions. Columbia is regulated by the Commission, but it is not funded by the Commission." Order, p. 39. Therefore, the Commission rejected Mr. Culbertson's arguments regarding insufficient auditing.

25. The Commission specifically considered and rejected Mr. Culbertson's position that another customer is entitled to relief. In his Petition, Mr. Culbertson once again advocates for

relief on behalf of another customer, Mr. Hicks. Petition, pp. 8, 9, 26. The Commission rejected this argument, stating:

We also will not consider any arguments Mr. Culbertson makes regarding Mr. Hicks' service line, as we agree with the ALJ that these issues are irrelevant and cannot be raised by Mr. Culbertson as he is not an attorney and cannot lawfully represent another customer. *See* 52 Pa. Code §§ 1.21(b), 1.22(a), 1.23(a).

Order, p. 48.

26. The Commission considered and rejected Mr. Culbertson's generic allegations that various laws and his constitutional rights have been violated. Throughout the Petition, Mr. Culbertson makes broad and unsupported allegations that Columbia and the Commission have violated federal laws, the Public Utility Code, and Mr. Culbertson's constitutional rights. Petition, pp. 9-17. These are the same general allegations that Mr. Culbertson previously raised in testimony and pleadings. In its Order, the Commission determined that Mr. Culbertson's arguments lack evidentiary and legal support. Order, pp. 45-49. The Commission stated:

Based on our review of the record, we deny Mr. Culbertson's Exception No. 4 as we agree with the ALJ's determination that Mr. Culbertson has failed to satisfy his burden of proof regarding his claims about Columbia's rates and service. As discussed in our disposition of Mr. Culbertson's Exception No. 1, Mr. Culbertson was provided with the opportunity to fully participate in all aspects of this proceeding, and he exercised that opportunity in most instances, with the exceptions of failure to submit or to submit timely responses to Columbia's Motion for a Protective Order and the Settlement.

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We have thoroughly reviewed Mr. Culbertson's direct and surrebuttal testimony, exhibits, and Main and Reply Briefs in reaching our determination and conclude that Mr. Culbertson did not provide sufficient evidence to establish his case by a preponderance of the evidence.

Order, p. 47.

27. For Mr. Culbertson to meet the *Duick* standard for granting reconsideration, he cannot simply re-raise the same arguments that were considered and rejected by the Commission.

As explained herein, the Commission previously considered and rejected all of the arguments raised in Mr. Culbertson's Petition for Reconsideration. Thus, Mr. Culbertson's Petition should be denied in its entirety.

V. CONCLUSION

WHEREFORE, for all the foregoing reasons, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Pennsylvania Public Utility Commission deny the Petition for Reconsideration filed by Richard C. Culbertson in its entirety.

Respectfully submitted,



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