
Lindsay A. Berkstresser

lberkstresser@postschell.com
717-612-6021 Direct
717-731-1985 Direct Fax
File #: 193132

April 27, 2022

VIA ELECTRONIC FILING

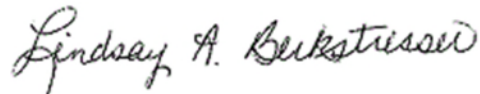
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PA PUC v. Columbia Gas of Pennsylvania, Inc.
Docket Nos. R-2022-3031211, et al.**

Dear Secretary Chiavetta:

Attached is the Prehearing Memorandum filed on behalf of Columbia Gas of Pennsylvania, Inc., in the above-referenced proceedings. Copies will be provided per the attached Certificate of Service.

Respectfully submitted,



Lindsay A. Berkstresser

LAB/kl
Attachment

cc: Honorable Christopher P. Pell (w/att.)
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).

VIA E-MAIL ONLY

Erica McLain, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ermclain@pa.gov

Sharon Webb, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
swebb@pa.gov

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

John W. Sweet, Esquire
Ria M. Pereira, Esquire
Lauren N. Berman, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite No. 300
Columbia, MD 21044
jmierzwa@exeterassociates.com

Robert D. Knecht
Industrial Economics Incorporated
5 Plymouth Road
Lexington, MA 02421
rdk@indecon.com

Mark D. Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mewen@indecon.com

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
*Counsel for PA Weatherization Providers
Task Force, Inc.*

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
Counsel for RESA/NGS Parties

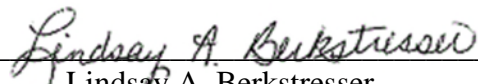
Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
Phillip D. Demanchick, Jr., Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
wesnyder@hmslegal.com
pddemanchick@hmslegal.com
Counsel for The Pennsylvania State University

James L. Crist, P.E.
Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
JLCrist@aol.com

Constance Wile
922 Bebout Road
Venetia, PA 15367
cjazdrmr@yahoo.com

Jose A. Serrano
2667 Chadbourne Drive
York, PA 17404
jas673@hotmail.com

Date: April 27, 2022



Lindsay A. Berkstresser

On April 14, 2022, the Commission issued an Order suspending Columbia's Supplement No. 337 by operation of law until December 17, 2022.¹

The Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania State University, Constance Wile, and Jose Serranno filed formal complaints. The Pennsylvania Weatherization Providers Task Force, Inc., the Retail Energy Supply Association, Shipley Choice, LLC, and NRG Energy, Inc., and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania filed petitions to intervene. The Commission's Bureau of Investigation and Enforcement filed a notice of appearance. Several customer complaints have been filed.

On April 26, 2022, Columbia filed Supplement 343 to Tariff Gas Pa PUC No. 9, which proposes to add the Green Path Rider to Columbia's tariff. Also on April 26, 2022, Columbia filed a Motion to Consolidate the Green Path Rider tariff filing with this base rate proceeding.

II. SERVICE OF DOCUMENTS

Columbia's counsel in this proceeding are Amy Hirakis, Esquire; Theodore Gallagher, Esquire, Michael Hassell, Esquire; and Lindsay Berkstresser, Esquire. Columbia requests that Michael Hassell be listed as the recipient for service. Mr. Hassell's contact information is provided below:

Michael W. Hassell (ID # 34851)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
Fax: 717-731-1985
E-mail: mhassell@postschell.com

¹ On April 22, 2022, Columbia filed Supplement No. 342 pursuant to the Commission's April 14, 2022 Suspension Order. Supplement No. 342 suspended the proposed rates contained in Tariff Supplement No. 325 until December 17, 2022.

Columbia also requests that Ms. Hirakis, Mr. Gallagher, and Ms. Berkstresser be added to any e-mail distribution lists in this proceeding. Ms. Hirakis's e-mail address is ahirakis@nisource.com. Mr. Gallagher's e-mail address is tjgallagher@nisource.com. Ms. Berkstresser's e-mail address is lberkstresser@postschell.com. Columbia requests that it be served with an electronic copy of all documents submitted in this proceeding.

The April 20, 2022 Prehearing Conference Order directs that parties who are represented by multiple attorneys should designate in their prehearing memorandum a lead representative for the purposes of the prehearing conference. The lead representative on behalf of Columbia for purposes of the prehearing conference will be Ms. Berkstresser.

III. WITNESSES AND ISSUES

Below is a list of the witnesses and the areas of their testimony comprising Columbia's direct case in this proceeding. The subject matters listed below represent as complete a statement of issues that Columbia can provide at this stage of the proceeding. Further definition of contested issues by the parties will develop within the scope of the subject matters listed below during the course of the proceeding.

Columbia presently intends to offer the following witnesses to testify in the base rate proceeding on the following subject matters:

<u>Statement Number(s)</u>		
1	Mark Kempic President and Chief Operating Officer Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Overview of the Company filing; b) Columbia's quality of service; and c) Management effectiveness
2	Melissa Bartos Vice President Concentric Energy Advisors 293 Boston Post Road West Suite 500	a) Residential and commercial sales volumes normalization; and b) Customer usage forecasts for the future and fully projected future test years.

	Marlborough, MA 01752	
3	Judith Siegler Lead Regulatory Analyst NiSource Corporate Services Company 801 E. 86 th Avenue Merriville, IN 46410	a) Pro Forma operating revenues; b) Calculation of Merchant Function Charge; and c) Annualization of Forfeited Discounts.
4	Kelley K. Miller Lead Regulatory Analyst NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	a) Revenue deficiency; b) Adjustments to operation and maintenance expenses.
5	John J. Spanos President Gannett Fleming, Inc. 207 Senate Avenue Camp Hill, PA 17011-2316	a) Depreciation study and service lives; and b) Annual and accrued depreciation.
6	Kevin L. Johnson Lead Regulatory Studies Analyst NiSource Corporate Services Company 290 West Nationwide Boulevard Columbus, OH 43215	a) Allocated Cost of Service Studies; b) Revenue allocation and rate design proposals; and c) Revenue Normalization Adjustment.
7	Raymond A. Brumley Director of Construction Columbia Gas of Pennsylvania, Inc. 2787 Memorial Boulevard Connellsville, PA 15425	a) Plant additions through FPFTY; and b) Overview of ongoing replacement activities
8	Paul R. Moul Managing Consultant P. Moul & Associates 251 Hopkins Road Haddonfield, NJ 08033	a) Cost of capital; and b) Fair rate of return.
9	Nicole M. Paloney Director of Rates and Regulatory Affairs Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Budgeted Operations and Maintenance; and b) Expenses for the FPFTY.
10	Jennifer Harding Director, Income Tax Operations NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	a) Income tax expense; b) Deferred income tax; and c) Other taxes.
11	Julie Covert Lead Regulatory Analyst	Rate Base.

	NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	
12	Ribeka Danhires Manager, Rates & Regulatory Service Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	Tariffs.
13	Deborah A. Davis Manager, Universal Services Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Hardship Fund update; b) Low-Income Usage Reduction Program; and c) Customer Outreach Efforts
14	C.J. Anstead Vice President of Gas Operations Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Cannonsburg, PA 15317	a) Overview of Columbia's distribution system; b) Historic operating performance; c) Safety and Compliance efforts; and d) Planned enhancements to Columbia's operations.
15	Nicholas Bly Manager of Corporate O&M and Consolidation NiSource Corporate Services Company 290 West Nationwide Boulevard Columbus, OH 43215	Budgeting Process and Financial Plan.
16	Theodore M. Love Partner Green Energy Economics Group, Inc. 2534 Dowingsville Road Lincoln, Vermont 05443	Energy Efficiency Plan

The testimony and exhibits fully support Columbia's proposed rate increase in Supplement No. 337, and fully support the design of rates to recover that increase from customers.

Columbia reserves the right to present testimony, sponsored either by the witnesses listed above or by further witnesses, as may be needed, regarding additional issues and subject matters that may arise during the course of the proceeding.

IV. PROCEDURAL SCHEDULE

Columbia proposes the following procedural schedule. The Company's proposed schedule is based on the due dates provided in the Prehearing Order.

Other Parties' Direct Testimony	June 7, 2022
Rebuttal Testimony	July 7, 2022
Surrebuttal Testimony	July 21, 2022
Rejoinder Outlines	July 27, 2022
Hearings for cross-examination of all witnesses, oral rejoinder	August 2-4, 2022*
Close of Record	Thursday, August 4, 2022
Main Briefs Due	Wednesday, August 23, 2022
Reply Briefs Due	Friday, September 2, 2022
Public Meeting	Thursday, December 8, 2022
End of Suspension	Saturday, December 17, 2022

*Columbia witness Paloney is available only on the August 2 hearing date.

V. **DISCOVERY**

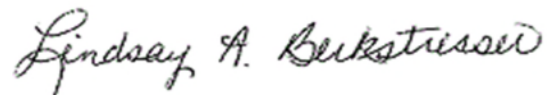
To date, Columbia has been served with and has answered numerous interrogatories. Proprietary information has been requested in discovery, and Columbia intends to timely submit an appropriate Motion for Protective Order.

Columbia encourages the use of informal discovery to expedite the discovery process.

VI. SETTLEMENT DISCUSSIONS

As of this time, no settlement discussions have been held. However, Columbia will be working with the parties in an effort to resolve these proceedings through settlement.

Respectfully submitted,



Theodore Gallagher (ID # 90842)
Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Phone: 724-416-6355
Fax: 724-416-6384
E-mail: tjgallagher@nisource.com

Michael W. Hassell (ID # 34851)
Lindsay A. Berkstresser (ID # 318370)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: mhassell@postschell.com
E-mail: lberkstresser@postschell.com

Amy E. Hirkakis (ID # 310094)
800 North 3rd Street
Suite 204
Harrisburg, PA 17102
Phone: 717-233-1351
E-mail: ahirkakis@nisource.com

Date: April 26, 2022