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File #: 126872

May 18, 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: National Fuel Gas Distribution Corporation's Universal Service and Energy  
Conservation Plan for 2022-2026 Submitted in Compliance with 52 Pa. § Code 62.4  
Docket No. M-2021-3024935**

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Dear Secretary Chiavetta:

Attached for filing is the Petition for Clarification and Reconsideration on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company") in the above-referenced proceeding.

As noted in the Petition, National Fuel is requesting **expedited consideration** of the matters set forth therein. The Company is requesting expedited consideration so that it can avoid incurring the unnecessary costs to implement the complex IT modifications involved in implementing the Approved LIRA Design, and promptly being the design and implementation of a PIP. To aid the Commission in its expedited consideration of the instant Petition, National Fuel requests that the answer period be shortened to five (5) days.

Copies will be provided as indicated in the attached Certificate of Service.

Respectfully submitted,

  
Garrett P. Lent

GPL/dmc

Rosemary Chiavetta  
May 18, 2022  
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Attachments

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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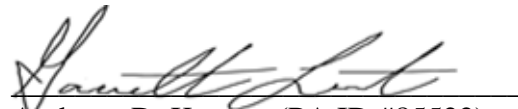
National Fuel Gas	:	
Distribution Corporation's	:	
Universal Service and Energy	:	
Conservation Plan for 2022-2026	:	Docket No. M-2021-3024935
Submitted in Compliance with	:	
52 Pa. Code § 62.4.	:	

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**NOTICE TO PLEAD**

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.572(E), ANSWERS TO PETITIONS GENERALLY ARE DUE WITHIN TEN (10) DAYS AFTER THE DATE OF SERVICE. **IN THE INSTANT PETITION, THE COMPANY REQUESTS AN EXPEDITED REVIEW OF THE PETITION BY THE PENNSYLVANIA PUBLIC UTILITY COMMISSION AND AN EXPEDITED ANSWER PERIOD OF FIVE (5) DAYS AFTER THE DATE OF SERVICE.** YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR ANSWER SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: May 18, 2022

*Attorneys for National Fuel Gas Distribution Corporation*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**PETITION FOR CLARIFICATION AND RECONSIDERATION**

**EXPEDITED RELIEF REQUESTED**

National Fuel Gas Distribution Corporation (“**National Fuel**” or “**Company**”) hereby files this Petition for Clarification and Reconsideration (“**Petition**”) of the Order entered May 3, 2022 in the above-referenced matter (“**Order**”) pursuant to the provision of 52 Pa. Code § 5.572. Given, the Company’s intention (described herein) to file a Revised Plan to implement a PIP within ninety days of the Commission approving this Petition, the Company requests that the Commission, **on an expedited basis**, reconsider and temporarily stay its requirement that the Company implement “LIRA IT Changes” (as such term is described and defined in Paragraph 15 herein), pending the Commission’s further review and approval of an expedited filing seeking implementation of a Percentage of Income Program (PIP) design. To aid the Commission in its expedited consideration of the instant Petition, National Fuel requests that the answer period be shortened to five (5) days. **As noted herein, the Company is authorized to represent that the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Pennsylvania Office of Consumer Advocate (“OCA”) are not opposed to National Fuel’s request for a temporary stay on implementation of certain IT changes, pending further Commission review, and stakeholder comment, of its subsequent filing for approval to implement a PIP design.**

In the alternative, and solely if the relief described in the preceding paragraph is not granted, National Fuel requests that the Commission: (1) reconsider its requirement that the

Company implement the “LIRA IT Changes” (as such term is described and defined in Paragraph 15 herein) and extend the timeframe for implementation of this change to nine months; and (2) clarify that, under the Approved LIRA Design, LIRA customers’ discount rate will be adjusted on a monthly basis, consistent with the Company’s proposal.

## **I. Factual Background.**

1. On or about March 31, 2021, National Fuel filed its proposed Universal Service and Energy Conservation Plan for 2022-2026 (the “**2022-2026 Plan**” or “**Plan**”).

2. Among other things, in its Plan, National Fuel had proposed several changes to its Low-Income Ratepayer Assistance program (“**LIRA**”) (*i.e.*, a CAP in which customers receive a discount off of National Fuel’s residential tariff rate, referred to as a “discount rate”) so as to incorporate the Commission’s recently issued guidance found in its CAP Policy Statement.<sup>1</sup> More specifically, National Fuel was particularly focused on bringing LIRA customers’ payments within the new “energy burden levels” specified in the CAP Policy Statement, and to this end proposed two (2) key changes to its LIRA in the Plan, namely: (a) addition of a new 90% discount rate; and (b) providing for *monthly* adjustments to a customer’s discount rate.<sup>2</sup>

3. Subsequently, pursuant to a July 15, 2021 Order of the Commission, National Fuel provided responses to the Commission’s data requests relative to the Plan and comments relative to the Plan were filed by OCA and CAUSE-PA (collectively, the “**Advocates**”).<sup>3</sup>

4. After the close of comments, the Commission issued the above-referenced Order which, *inter alia*, approved National Fuel’s Plan subject to conditions established in said Order.

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<sup>1</sup> Unlike other utilities, National Fuel’s LIRA is styled as a “rate discount” program as opposed to a “percentage of income program” or “PIP.” *See*, Order at 5, n. 5.

<sup>2</sup> Plan at 15. *See also*, Reply Comments of National Fuel at 6, filed at Docket No. M-2021-3024935 on October 13, 2021.

<sup>3</sup> *See, e.g.*, the following filed at the above-captioned docket: (1) National Fuel’s Response to Request for Information filed on August 24, 2021; (2) Comments of OCA filed on September 14, 2021; (3) Comments of CAUSE-PA filed on September 14, 2021; (4) National Fuel’s Reply Comments filed on October 13, 2021; (5) OCA’s Reply Comments filed on October 13, 2021; and (6) CAUSE-PA’s Reply comments filed on October 13, 2021.

5. While the Order is clear that National Fuel’s Plan is approved “with the exception of . . . changes and issues that are specifically addressed in this Order,”<sup>4</sup> the Order appears to mischaracterize one of the two (2) key changes National Fuel proposed to its LIRA (*i.e.*, the *monthly* adjustment of a customer’s “discount rate”). More specifically, National Fuel notes:

a. As presented in its Plan and further explained in its data request, National Fuel’s Plan proposed a *monthly* adjustment of a customer’s discount rate. In its Reply Comments, National Fuel felt it particularly important to clarify any confusion relative to this component of National Fuel’s Plan. In this regard, National Fuel explained:

- **Monthly Adjustment of the Participant’s Discount Rate to Account for New Energy Burden Levels (the “Monthly Adjustment Modification”)**: The Comments suggest there is a need for National Fuel to provide further explanation regarding this modification to LIRA. In its 2017-2020 Plan (*i.e.*, the Current Plan), a LIRA participant’s Discount Rate would generally change only if the aggregate income level of the household changed or if the number of people in a household changed.

In the instant Plan, National Fuel proposes to modify the existing practice so as to cause a “participant’s Discount Rate [to be] set and *adjusted monthly* to the greater of: (1) The Discount Rate . . . [based on the aggregate income and household size]; or (2) The Discount Rate **which brings the participant’s energy burden within the levels specified in the CAP Policy Statement (or as close to such energy burden levels as possible).**”

This change is designed to bring LIRA participants within the New Energy Burden Levels, even during periods of higher consumption. <sup>5</sup>

b. The Order, in contrast, appears to be premised on the fact that National Fuel’s LIRA will continue to be adjusted on an *annual* basis.<sup>6</sup>

6. In addition, the Commission required National Fuel to, *inter alia*:

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<sup>4</sup> Order at 7 and 75 (Ordering paragraph 1).

<sup>5</sup> Reply Comments of National Fuel at 6, filed at Docket No. M-2021-3024935 on October 13, 2021 (emphasis in original).

<sup>6</sup> *See, e.g.*, Order at 9-11.  
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- a. Make several additional changes to its LIRA Program, including, *inter alia*,
  - (i) amending the LIRA payment methodology to ensure a household's calculated discount rate "is always rounded up" ("**Revised LIRA Payment Rounding Methodology**"); and
  - (ii) eliminating the 36-month time limit for PPA forgiveness ("**LIRA PPA Timeframe Removal**");
- b. Provide several additional reports at set intervals during the life of the Plan, including, *inter alia*, an annual report on the number of LIRA households who receive monthly bills exceeding their targeted energy burdens and the reasons for it; and
- c. Track various other metrics relative to its LIRA and consult with its USAC relative to same, including, *inter alia*,
  - (i) information on LIRA households receiving monthly bills exceeding their targeted energy burdens and reasons for it;
  - (ii) information on the number of LIRA customers who require more than 36 months to achieve full PPA forgiveness and the costs associated with this extended forgiveness period.

7. While the Order also indicates that the Plan shall become effective when the provisions of the Plan are implemented (and until such time, National Fuel's 2017-2021 Plan shall remain in effect),<sup>7</sup> the Order does not explicitly specify the time period when the Plan shall be fully implemented. However, by implication, a plausible reading of the Order would require full implementation of the Plan within six (6) months, as that is the time period prescribed by the Order for which the Revised LIRA Payment Methodology and the LIRA PPA Timeframe Removal are required to be in place.<sup>8</sup>

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<sup>7</sup> Order at 79, Ordering Paragraph 14.

<sup>8</sup> Order at 78, Ordering Paragraph 6.

## II. Legal Standards

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

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.

9. The Commission has cautioned that the operative language of the *Duick* standard focuses on the deliberations of the Commission, not the arguments of the parties. See *Pa. PUC v PPL Electric Utilities Corp.*, Docket No. R-2012-2290597 (Order entered May 22, 2014).

10. As explained below, this Petition meets the *Duick* standards because it raises issues that appear to have been overlooked or not addressed by the Commission. It also explains the Company's intent to amend its Plan to incorporate a PIP, which affects the implementation timing.

## III. Matters for Reconsideration:

### a. MATTER FOR RECONSIDERATION:

**Request That the Commission Suspend Its Regulatory Deadlines for Implementing the LIRA IT Changes Necessary for the New Plan Given National Fuel's Intention to File a PIP.**

11. After reviewing the Order and commencing internal processes (including without limitation working with its IT Department) to begin implementation of National Fuel's LIRA as presented in the Plan, with the modifications requested in the Order (the “**Approved LIRA Design**”), National Fuel has come to believe that the level of IT complexities involved in implementing the Approved LIRA Design are significant and would be better channeled into the design/implementation of a PIP.

12. In this regard, National Fuel believes that given recent positions of advocates, of the Commission, and other stakeholders in this space, National Fuel will ultimately be required to move to a PIP or other CAP design in the future. As such, rather than incur costs to design and implement the LIRA changes, only to have to abandon them in the future and design an alternate CAP program structure, it would be more prudent use of funds to simply implement a PIP. Restated, the Company wants to avoid any situation where it incurs the costs to implement its revised 90% discount rate methodology and then would be required to implement a PIP at a later date and incur additional costs that would be unnecessary if a PIP is implemented at this time.

13. Moreover, and as a result of said recent internal discussions informed by/in light of the implementation process to date, it is believed that a PIP design would provide LIRA customers with the same general benefit of the Approved LIRA Design, but in a clearer, easier to understand manner.

14. Consequently, after undertaking the above-described internal processes necessary to implement the Order (including without limitation eliciting feedback from National Fuel's IT Department after the entry of the Order), and giving further consideration to the Advocates and the Commission's comments regarding PIP plans and is agreeable to implementing a PIP, the Company intends to immediately devise a PIP and file a revised Plan (solely with respect to modifying LIRA from its current design to a PIP) within ninety (90) days of an order granting the relief identified in the Section III(a) of this Petition. The Company further intends to propose a time period for implementing the PIP in such revised Plan.

15. Given the foregoing, in order to avoid incurring unnecessary costs, the Company requests that the Commission suspend the time period for implementing all IT changes in the Approved LIRA Design that would not be necessary if a PIP was implemented, including, among other things, the following (collectively, the "**LIRA IT Changes**"):

- a. The Revised LIRA Payment Rounding Methodology;

- b. The *Monthly* adjustment of LIRA Customer’s discount rate;
- c. The new 90% discount tier;

16. Save-for the matters discussed above, National Fuel remains committed to implementing all other aspects of its Plan, as approved by the Commission, within six (6) months of the date of the Order, including without limitation, the following:

- a. All components of LIURP (including LC-LIURP Pilot) as specified in the Plan, subject to the conditions imposed by the Order;
- b. All components of the Neighbor for Neighbor as specified in the Plan, subject to the conditions imposed by the Order;
- c. All components of the Approved LIRA Design other than the LIRA IT Changes. In this regard, the Company would, among other things, implement the following within six (6) months of the date of the Order:

- Removal of the “payment-troubled” LIRA eligibility requirement.
- Modification of the LIRA application process, to ensure that low-income eligibility is determined with reference to *either* 30 days or annual income, whichever is more advantageous to the customer.
- Removal of the LIRA requirement that the enrolled customer must designate the Low Income Home Energy Assistance Program (“**LIHEAP**”) grant to National Fuel.
- Elimination of late payment charges for all enrolled LIRA participants.
- Requirements contained in subparts (b) – (f) inclusive from Ordering Paragraph 5 of the Order (including among other things removal of unearned income of the minor from LIRA eligibility and elimination of the 36-month time limit for PPA forgiveness).

17. If the Commission grants National Fuel’s requested relief pursuant to this Section III(a) of the Petition, National Fuel will still comply with the requirement contained in Ordering Paragraph 2 of the Order by filing a “revised” Plan within (30) days of the entry of the Order (*i.e.*, June 2, 2022), with *all* of the requested changes specified in the Order – including those portions of the LIRA IT Changes for which National Fuel is seeking relief per this Petition. However, National Fuel would add language in conspicuous type noting those LIRA IT Changes which are

subject to the requested stay pending further review of National Fuel's subsequent filing to implement a PIP design.

18. National Fuel has shared the foregoing (and a copy of this Petition) with the Advocates. In addition, National Fuel has shared that in proposing the PIP in the manner specified above, it would be National Fuel's intention to work collaboratively with the Advocates and present the Petition with the proposed PIP to the Commission *after* the Advocates' receipt and review of same (and possibly proposing it as a joint petition, if consensus can be reached). In furtherance of the foregoing, National Fuel plans and will use best efforts to meet with the Advocates at least three (3) times over video conferencing technology during the above-described 90-day period (with the target being one each month during said period) during which National Fuel plans on designing the PIP for purposes of eliciting feedback/comment during same.

19. **CAUSE-PA and the OCA have authorized the Company to indicate that they are not opposed to National Fuel's request for a stay on implementation of the within-described LIRA IT Changes, pending National Fuel's subsequent filing for approval to implement a PIP design within 90-days and subsequent review and implementation of such PIP design at this docket. CAUSE-PA and OCA reserve the right to file comments or other appropriate responsive pleadings or documents in response to National Fuel's subsequent filing for approval of a PIP design.**

20. National Fuel will continue to implement those portions of the Plan and will comply with all aspects of the Commission's Order which do not involve the LIRA IT Changes.

WHEREFORE, National Fuel Gas Distribution Corporation respectfully requests that the Commission reconsider the requirement for the Company to implement the LIRA IT Changes within six (6) months of the entry of the May 3, 2022 Order due to the complexity of the programming and because the Company intends to file a revised Plan to implement a PIP and, in

this regard, respectfully requests the Commission stay all regulatory deadlines related to the LIRA IT Changes identified above, so long as the Company files a PIP within ninety (90) days of the entry of the Commission's Order granting the relief requested in this Petition.

**b. IN THE ALTERNATIVE TO THE RELIEF REQUESTED IN SECTION III(A) OF THIS PETITION - MATTER FOR RECONSIDERATION/CLARIFICATION:**

**Request That the Commission Extend the Time Period for Implementing LIRA IT Changes to Nine (9) Months and Clarify the LIRA Discount Rate Adjustment Frequency Referenced in the Order.**

21. While National Fuel's clear preferred position is for the Commission to stay the regulatory deadlines related to implementation of certain LIRA IT Changes, in the alternative, National Fuel requests that the Commission reconsider and/or clarify (as the case may be) that implementation of all of the Approved LIRA Design elements requiring the development and deployment of the LIRA IT Changes should be completed within nine (9) months of the date of entry of the Order.

22. In this regard, the Company notes reconsideration of this timeline is justified insofar as the Order does not account for the fact that the Company has proposed that the customers' LIRA "discount rate" is adjusted on a *monthly* basis (*i.e.*, a design change which involves significant amount of IT time to implement, versus the current LIRA design, which adjusts same on an annual basis).

23. Significantly, while the foregoing relief would provide National Fuel the necessary time to design/deploy the LIRA IT Changes, it would not prevent the Company from undertaking the cost to develop those LIRA IT Changes necessary to implement the Approved LIRA Design. Consequently, insofar as the Company would incur such costs, it may elect to not file a PIP in such scenario.

24. Similarly, the Company would also request that the Commission clarify those portions of the Order which refer to LIRA making adjustments to the customers' discount rates on

an “annual” basis and instead note that such adjustments will take place on a “monthly” basis as specified in National Fuel’s Plan and supplemental filings.

WHEREFORE, National Fuel Gas Distribution Corporation respectfully requests that the Commission: (1) clarify that under the Approved LIRA Design, customers’ discount rate will be adjusted monthly; and (2) reconsider the requirement for the Company to implement the LIRA IT Changes within six (6) months of the May 3, 2022 Order due to the complexity of the programming by extending such implementation deadline to nine (9) months from the date of the entry of said Order.

**c. MATTER FOR CLARIFICATION:  
Time Period Covered by National Fuel’s Plan**

25. As a final matter of clarification, National Fuel requests confirmation as to the timeframe during which the Plan will be effective. More specifically, the Order indicates the Plan will be effective through 2026,<sup>9</sup> but indicates National Fuel’s next Universal Service and Energy Conservation Plan will cover “the five year period starting on January 1, 2028”<sup>10</sup> (and specifies dates ahead of same for its next third-party independent evaluation (due April 1, 2026) and the date by which National Fuel shall file its next Plan (due April 1, 2027)).<sup>11</sup>

26. Given the foregoing, National Fuel seeks clarification from the Commission as to the date through which the Plan approved by the Order shall remain effective. To the extent there is any modification from that specified above, National Fuel also would seek clarification as to dates by which the above-referenced third-party independent evaluation and filing deadline for the next Plan are due.

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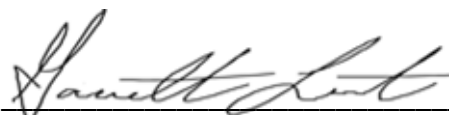
<sup>9</sup> See, Order at 75, Ordering paragraph 1.

<sup>10</sup> Order at 80, Ordering paragraph 16.

<sup>11</sup> Order at 79-80, Ordering paragraphs 15-16.

WHEREFORE, National Fuel Gas Distribution Corporation respectfully requests that the Commission clarify the date through which the Plan approved by the Order shall remain effective (and any corresponding change, if any, to the due date for the third-party independent evaluation for the current Plan and the date by which the next Plan shall be filed).

Respectfully submitted,



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Dated: May 18, 2022

*Attorneys for National Fuel Gas Distribution Corporation*

**VERIFICATION**

I, Michelle Kosko, certify that I am a Consumer Business Manager for National Fuel Gas Distribution Corporation, and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that the Company expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

DocuSigned by:

*Michelle Kosko*

9CA24DBACC849B...  
Michelle Kosko

Consumer Business Manager  
National Fuel Gas Distribution Corporation

DATED: May 18, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a party)

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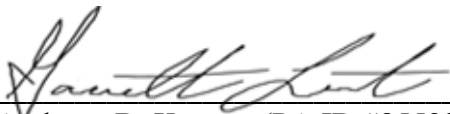
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Dated: May 18, 2022

*Attorneys for National Fuel Gas Distribution Corporation*