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File #: 196137

July 1, 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: Columbia Gas of Pennsylvania, Inc. Supplement No. 343 Proposed Tariff
Modifications for Inclusion of the Green Path Rider
Docket Nos. R-2022-3032167, et al.**

Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum on behalf of Columbia Gas of Pennsylvania, Inc. in the above-referenced proceeding. Copies are being provided per the attached Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/kl
Attachment

cc: Honorable Christopher P. Pell (*via email; w/att.*)
Honorable John M. Coogan (*via email; 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

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Date: July 1, 2022



Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2022-3032167
Office of Consumer Advocate	:	C-2022-3032404
Retail Energy Supply Association,	:	C-2022-3032550
Shipley Choice, LLC, and NRG Energy,	:	
Inc.	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**PREHEARING CONFERENCE MEMORANDUM
OF COLUMBIA GAS OF PENNSYLVANIA, INC.**

TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE CHRISTOPHER P. PELL AND
ADMINISTRATIVE LAW JUDGE JOHN COOGAN:

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated June 22, 2022, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”), hereby submits this Prehearing Conference Memorandum in the above-captioned matter and states as follows:

I. PROCEDURAL HISTORY

On April 26, 2022, Columbia filed Supplement No. 343 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 343”) to become effective on January 1, 2023. Supplement No. 343 proposes the implementation of a 5-year pilot program, called the Green Path Rider, that would allow Columbia’s customers an option to reduce some or all of their emissions related to their natural gas usage.

Also on April 26, 2022, Columbia filed a Motion to Consolidate Supplement No. 343 with its currently pending base rate case filed at Docket No. R-2022-3031211, so that both filings could be litigated as part of Columbia’s base rate proceeding.

On May 9, 2022, the Office of Consumer Advocate (“OCA”) filed a Public Statement and a Formal Complaint against Supplement No. 343 at Docket No. C-2022-3032404.

On May 12, 2022, Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge John Coogan (collectively, the “ALJs”) issued an Order denying Columbia’s Motion to Consolidate Supplement No. 343 with the currently pending base rate case at Docket No. R-2022-3031211.

On May 18, 2022, the Retail Energy Supply Association, Shipley Choice, LLC, and NRG Energy, Inc. (“RESA/NGS Parties”) filed a Formal Complaint against Supplement No. 343 at Docket No. C-2022-3032550.

On May 19, 2022, the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

Also on May 19, 2022, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance, Notice of Intervention, Public Statement, and Verification.

On June 14, 2022, Pennsylvania State University (“Penn State”) filed a Petition to Intervene.

Also on June 14, 2022, Columbia filed a letter with the Commission indicating that the Company provided public notice of Supplement No. 343 by publication in newspapers of general circulation within the Company’s service territory. Specifically, Columbia provided notice on June 10, 2022, in the following newspapers: Trib Total Media (Tribune Review); Valley News Dispatch; York Daily Record/York Dispatch; Somerset Daily American; Uniontown Herald Standard; Daily Courier; Kittanning Leader Times; Gettysburg Times; Bradford Era; Center Daily Times; Butler Eagle; and the Washington Observer-Reporter. Additionally, on June 12, 2022, Columbia provided public notice of Supplement No. 343 by publication in the Pittsburgh Post-Gazette. Moreover, Columbia published notice of Supplement No. 343 on its social media

platforms on June 17, 24, and 30, 2022. The Company's website has included notice of Supplement No. 343 since June 12, 2022.

On June 16, 2022, the Commission instituted an investigation into the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in the proposed Supplement No. 343. Additionally, pursuant to Section 1308(b) of the Public Utility Code, 66 Pa. C.S.A. § 1308(b), Supplement No. 343 was suspended by operation of law until July 1, 2023, unless permitted by Commission Order to become effective at an earlier date.

On June 22, 2022, the ALJs issued a Prehearing Conference Order which, among other things, directed parties to file Prehearing Memoranda by 12:00PM on July 1, 2022.

Also on June 22, 2022, Columbia filed a Notice of Appearance.

On June 24, 2022, Columbia made its Compliance Filing, suspending the proposed rates and rules contained in Supplement No. 343 until July 1, 2023.

On June 30, 2022, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed a Petition to Intervene.

Columbia herein files this Prehearing Conference Memorandum in anticipation of the Prehearing Conference.

II. SERVICE OF DOCUMENTS

Columbia requests that Amy E. Hirakis, Theodore J. Gallagher, Michael W. Hassell, Lindsay A. Berkstresser, and Nicholas A. Stobbe be listed on the service list on behalf of the Company. Their contact information is provided below:

Theodore J. Gallagher (ID # 90842)
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Columbia agrees to receive service of documents electronically in this proceeding. For the purposes of the Prehearing Conference, Lindsay A. Berkstresser will be the primary attorney speaking on behalf of Columbia.

III. WITNESSES AND ISSUES

Below is a list of the witnesses that Columbia intends to call in this proceeding and the subject areas of their testimony. Further definition of the issues will be developed by the parties during the course of this proceeding. Columbia reserves the right to call additional witnesses, present testimony, or both on additional issues and subject matters that may arise during the course of this proceeding.

<u>Witness</u>	<u>Statement</u>	<u>General Subject Matter</u>
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Erich A. Evans Strategy and Risk Integration Director NiSource Corporate Services Company W. Nationwide Blvd. Columbus, OH 43215	Columbia St. No. 1	Overview and Description of the Green Path Rider
Andrew S. Campbell Director, Portfolio Planning and Origination Northern Indiana Public Service Company LLC 1500 165 th St. Hammond, IN 46324	Columbia St. No. 2	Explanation of Renewable Natural Gas and Carbon Offsets
Ribeka Danhires Manager, Rates and Regulatory Service Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	Columbia St. No. 3	Explanation of Tariff Changes Related to Green Path Rider

Columbia may amend its pre-filed statements and exhibits, as appropriate, during the course of this proceeding, based upon more recent information, as such information becomes available. Such update(s) will reflect changes in information relevant to the determination of the rates and rules to become effective July 1, 2023.

IV. DISCOVERY

Columbia does not propose any special orders regarding discovery. Columbia has received interrogatories from other parties and has already begun to answer those interrogatories. Columbia is not aware of any outstanding discovery disputes. Columbia is willing to work with the parties, through informal discovery, to expedite discovery. The protection of confidential information is addressed in Section VII. below.

V. PROCEDURAL SCHEDULE

Columbia proposes the following schedule for this proceeding:

Direct Testimony of Other Parties: December 1, 2022

Rebuttal Testimony: January 9, 2023

Surrebuttal Testimony: February 6, 2023

Rejoinder Testimony: February 13, 2023

Telephonic Evidentiary Hearings: February 15-16, 2023

Main Briefs: March 10, 2023

Reply Briefs: March 22, 2023

It is Columbia's understanding that I&E and RESA/NGS Parties are agreeable to the above-referenced schedule.

VI. PUBLIC INPUT HEARINGS

Columbia is not aware of any substantial consumer interest with respect to the proposed rate and rule changes. Columbia does not propose that any public input hearings be held absent substantial public interest in the filing.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

Columbia will submit a Motion for Protective Order for consideration by the ALJs. Columbia will seek the concurrence of the other parties as to the form of the Protective Order before submitting the Motion.

VIII. SETTLEMENT DISCUSSIONS

To date, 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,



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Date: July 1, 2022

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Inc.