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Garrett P. Lent

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File #: 176154

November 21, 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. National Fuel Gas Distribution Corporation**  
**Docket No. R-2022-3035730; C-2022-3036725**

Dear Secretary Chiavetta:

By letter dated November 9, 2022, National Fuel Gas Distribution Corporation (“National Fuel”) received notice of the Complaint of the Office of Consumer Advocate (“OCA”) filed in the above-referenced proceeding. Section 5.61(d) of the Pennsylvania Public Utility Commission’s (“Commission”) regulations states:

*(d) Answers to complaints in rate proceedings.* For complaints which are docketed with Commission-instituted rate proceedings, an answer may be filed within 10 days of date of service. However, an answer is not required, except as may be directed by the Commission or the presiding officer.

Because the above-referenced Complaint has been docketed to a rate proceeding, National Fuel will not be filing an Answer to the Complaint in accordance with the provisions of 52 Pa. Code § 5.61(d), unless otherwise directed to file an Answer by the Commission or the Presiding Officer assigned to this proceeding.

Nevertheless, National Fuel notes that the Complaint submitted by the OCA contains an inaccurate allegation. In Paragraph D of the Complaint, OCA avers that “[t]he Company also proposes to recover \$7.7 million of other post-employment benefits (OPEB) expenses as a part of its revenue

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increase in this proceeding.” National Fuel is not proposing to recover \$7.7 million of OPEB expenses in this proceeding. Rather, as explained in the Statement of Reasons and its direct testimony, National Fuel’s filing reflects a voluntary reduction in its base rates effective October 2021 of \$7.7 million to stop recovery of OPEB expenses that were authorized in its last base rate proceeding.

Please direct any questions about this letter to the undersigned. Copies of this letter will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Garrett P. Lent". The signature is written in a cursive style with a large initial "G" and "L".

Garrett P. Lent

GPL/cls

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL

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Date: November 21, 2022



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