

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2024-3045945
	:	
Peoples Natural Gas Company LLC	:	
1307(f) 2023 Proceeding	:	

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**PETITION TO INTERVENE  
OF THE  
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

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Pursuant to 52 Pa. Code § 5.72-5.75, the Pennsylvania Independent Oil & Gas Association (PIOGA) petitions to intervene in this proceeding. In support of its intervention, PIOGA avers as follows.

1. PIOGA is a Pennsylvania nonprofit trade association representing oil and natural gas interests in Pennsylvania. PIOGA’s members include natural gas producers and Pennsylvania Public Utility Commission-licensed natural gas suppliers and marketers (NGSs) that produce, transport and market natural gas, including Pennsylvania Appalachian production, on the pipeline system of the Peoples Natural Gas Company LLC (Peoples) for system supply and transportation customers.

2. On March 1, 2024, Peoples filed and served the materials required by the Commission’s regulations at 52 Pa. Code Sections 53.64(c), 53.64(i) and 53.65 to be filed thirty (30) days before the filing of a tariff under 66 Pa. C.S. section 1307(f).

3. On April 1, 2024, Peoples filed and served its annual filing comprising its direct testimony, exhibits and Pro Forma Tariff Supplement pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. § 1307(f), and the Commission’s regulations.

4. The gas cost rates established in this proceeding will be the rates against which PIOGA's NGS members will compete to serve their existing customers and to obtain new customers on the Peoples system. PIOGA members' operations are directly affected by the company's least cost fuel procurement practices, methodologies and policies, as PIOGA members' Pennsylvania Appalachian production continues to be a source of baseload supply for the Peoples system and customers. PIOGA producers and its NGS members' transportation customers are also directly affected by Peoples' practices, methodologies and policies concerning pipeline replacements and abandonments, lost and unaccounted for gas (LUFG), retainage rates and measures to reduce LUFG, as well as the reduction of the Goodwin gathering system retainage, all of which are issues raised by Peoples' filing.

5. PIOGA and its members will be bound by the Commission's determinations in this proceeding.

6. PIOGA's interests and the interests of its members cannot be adequately represented by any other party in this proceeding, including any PIOGA member that may participate individually that may raise issues specific to its relationships with Peoples or any other non-PIOGA member producer or NGS.

7. PIOGA's intervention is also in the public interest. PIOGA has consistently participated in the Peoples companies' previous Section 1307(f) proceedings as well as Peoples' 2019 base rate proceeding and its current base rate proceeding, which places PIOGA in a position to contribute to the development of the record in this matter.

**WHEREFORE**, PIOGA respectfully requests that its petition to intervene in this proceeding be granted.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kevin J. Moody". The signature is written in a cursive style and is contained within a light gray rectangular box.

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Kevin J. Moody, Esquire  
I.D. No. 34367  
General Counsel  
Pennsylvania Independent Oil & Gas Association  
212 Locust Street, Suite 300  
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Dated: April 2, 2024

VERIFICATION

I, Daniel J. Weaver, President and Executive Director of the Pennsylvania Independent Oil & Gas Association (PIOGA), hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that PIOGA expects to be able to prove the same at a hearing held in these proceedings. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S § 4904 (relating to unsworn falsification to authorities).

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Daniel J. Weaver

Date: April 2, 2024

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of PIOGA's Petition to Intervene upon the persons listed below in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA EMAIL only**

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Kevin J. Moody, Esquire  
General Counsel, PIOGA

Date: April 2, 2024

