

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3045945
	:	
Peoples Natural Gas Company LLC	:	
1307(f) 2024 Proceeding	:	

**PREHEARING CONFERENCE MEMORANDUM
OF THE
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

To the Honorable Katrina L. Dunderdale, Administrative Law Judge:

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and Your Honor’s Prehearing Conference Order dated March 29, 2024, the Pennsylvania Independent Oil & Gas Association (PIOGA) submits this prehearing conference memorandum.

BRIEF HISTORY OF PROCEEDINGS

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).

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.

The Commission’s Bureau of Investigation and Enforcement (I&E) entered its appearance, while the Office of Consumer Advocate (OCA) and the Office of Small Business Advocate (OSBA) filed formal complaints. PIOGA filed and served its petition to intervene on April 2, 2024, and intends to serve its first set of discovery on Peoples today.

SERVICE LIST

PIOGA's entry on the service list is:

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WITNESS AND SUBJECT MATTER OF TESTIMONY

PIOGA has not yet determined whether it will be necessary to provide testimony, or whom it may present as a witness if PIOGA determines testimony is necessary or the specific subject matter of any testimony PIOGA provides to address the issues identified below or the issues that may be raised by other parties.

ISSUES

Based upon its analysis of Peoples' filing at this point, PIOGA is concerned with the following issues: (i) least cost fuel procurement practices, policies and methodologies, particularly related to locally produced gas from conventional formations; (ii) practices and measures to address and mitigate lost and unaccounted for gas (LUFG), including pipeline replacements and abandonments; (iii) producer retainage levels and measurements, including Peoples' proposed uniform producer retainage level; and (iv) the determination of the reduction of the producer retainage rate on the Goodwin gathering system. PIOGA reserves the right to identify, address and raise other issues that may affect PIOGA's interests as well as to address issues raised by other parties that may affect PIOGA's interests.

PROPOSED LITIGATION SCHEDULE

PIOGA will cooperate with the other parties to establish a reasonable litigation schedule.

MODIFICATION OF DISCOVERY RULES

PIOGA is amenable to discussing reasonable modifications to the Commission's discovery rules as has become customary to accommodate reduced response times and email service and other concerns that arise.

Respectfully submitted,



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Dated: April 15, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of PIOGA's Prehearing Memorandum in the above referenced proceedings upon the Presiding Officer and parties 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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Date: April 5, 2024