



April 15, 2024

***Via E-Mail Only***

Jeffrey A. Watson, Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 Fifth Avenue, Suite 220,  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.  
Docket No. R-2024-3046519**

***Prehearing Memorandum of CAUSE-PA***

Your Honor:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ria M. Pereira".

Ria M. Pereira, Esq.  
*Counsel for CAUSE-PA*

CC: Secretary Rosemary Chiavetta (via E-file)  
Mary Swarner, Legal Assistant, [mswarner@pa.gov](mailto:mswarner@pa.gov) (via E-mail)  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
v. : Docket No. R-2024-3046519  
Columbia Gas of Pennsylvania, Inc. :

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**PREHEARING MEMORANDUM  
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES  
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

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**PENNSYLVANIA UTILITY LAW PROJECT**

*Counsel for CAUSE-PA*

Ria M. Pereira, Esq., PA ID: 316771

Elizabeth R. Marx, Esq., PA ID: 309014

John W. Sweet, Esq., PA ID: 320182

Lauren N. Berman, Esq., PA ID: 310116

118 Locust Street

Harrisburg, PA 17101

Tel.: 717-236-9486

Fax: 717-233-4088

[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

**April 15, 2024**

On April 10, 2024, a Prehearing Conference Order was issued by the Honorable Administrative Law Judge (ALJ) Jeffrey A. Watson setting a telephonic prehearing conference for Wednesday, April 17, 2024 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than Monday, April 15, 2024. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum.

**I. Background**

On March 15, 2024, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) submitted a rate filing, Supplement No. 373 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 337”) which proposes to increase overall rates by approximately \$124.1 million per year. According to the Company, the total bill for a residential customer who purchases 70 therms of gas from Columbia per month, would increase from \$118.16 to \$136.92 per month, or by 15.88 percent. (Filing Cover Ltr. at 1-2).

On April 4, 2024, CAUSE-PA filed a Petition to Intervene and Answer in the above-captioned proceeding, in which CAUSE-PA respectfully requests that the Commission enter an order granting CAUSE-PA full status as an intervener in this proceeding with active party status.

**II. Issues to be Presented**

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, Columbia Gas must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2203. In determining whether rates are just and reasonable, the Commission must examine whether rates are affordable and accessible to those served.

If the Commission approves any natural gas distribution rate increase, the Commission should condition approval on Columbia Gas's agreement to perform such actions as are necessary to ensure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of Columbia Gas's proposed tariff changes and testimony and opposes Columbia Gas's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding to determine whether Columbia Gas's proposals are just, reasonable, and in the public interest -- though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of Columbia Gas's rate filing and proposed rate increase on low income households.
- ii. The effect of Columbia proposal to increase its monthly residential customer charge from \$16.75 to \$26.00. (Columbia St. 6 at 21: 19-22), including the effect of this proposed increase on low income households, and on the ability to achieve appreciable bill savings through adoption of energy efficiency measures.
- iii. The effect of Columbia Gas's rate filing and proposed rate increase on low income households enrolled in or eligible for the Company's Universal Service and Energy Conservation Programs, and the continued adequacy of those programs in delivering universally accessible service.

### **III. Witnesses and Testimony**

CAUSE-PA is in the process of identifying and determining expert witnesses for this proceeding. We reserve the right to call expert witnesses, including additional or substitute witnesses as may be warranted, upon proper notice to Your Honor and the parties.

Any witness identified by CAUSE-PA would address the issues identified above, as well as any other relevant issues that may arise through the course of this proceeding.

### **IV. Discovery**

CAUSE-PA does not propose specific discovery modifications in this proceeding but is involved in discussions with the parties regarding mutually agreeable modifications.

### **V. Public Input Hearings**

CAUSE-PA supports the scheduling of public input hearings in this matter. CAUSE-PA recommends that the Commission consider the use of telephonic and in-person public input hearings to encourage participation by the ratepayers.

### **VI. Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

### **VII. Service on CAUSE-PA**

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
**PENNSYLVANIA UTILITY LAW PROJECT**

118 Locust Street  
Harrisburg, PA 17102  
Telephone: 717-236-9486  
Facsimile: 717-233-4088  
E-mail: [pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

CAUSE-PA requests that parties agree to electronic service in this proceeding.

**VIII. Representation of CAUSE-PA at Prehearing Conference**

At the Prehearing Conference, CAUSE-PA will be represented by Ria M. Pereira, Esq.

**IX. Litigation Schedule**

CAUSE-PA is currently involved in discussions with the Company and other parties to reach a mutually agreeable litigation schedule. In the absence of a mutually agreed upon schedule between parties, CAUSE-PA proposes the following procedural schedule:

- Complainant and Intervenor Direct Testimony – June 14, 2024
- All Parties’ Rebuttal Testimony – July 11, 2024
- All Parties’ Surrebuttal Testimony – July 25, 2024
- Rejoinder or Rejoinder Outline(s) – July 30, 2024, noon
- Evidentiary Hearings – August 1-2, 2024
- All Parties’ Main Briefs – August 20, 2024
- All Parties’ Reply Briefs – August 30, 2024

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Memorandum.

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



Ria M. Pereira, Esq., PA ID: 316771  
Elizabeth R. Marx, Esq., PA ID: 309014  
John W. Sweet, Esq., PA ID: 320182  
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Pennsylvania Public Utility Commission	:	
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v.	:	Docket No. R-2024-3046519
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**Certificate of Service**

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**Via Email**

Jeffrey Watson, Administrative Law Judge Pennsylvania Public Utility Commission 301 5th Avenue Suite 220 Pittsburgh, Pennsylvania 15222 <a href="mailto:jeffwatson@pa.gov">jeffwatson@pa.gov</a>  cc: Mary Swarner, Legal Assistant, <a href="mailto:mswarner@pa.gov">mswarner@pa.gov</a>	
Michael W. Hassell, Esq. Megan Rully, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101-1601 <a href="mailto:mhassell@postschell.com">mhassell@postschell.com</a> <a href="mailto:MRulli@PostSchell.com">MRulli@PostSchell.com</a>	Scott B. Granger, Esq. Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 <a href="mailto:sgranger@pa.gov">sgranger@pa.gov</a>
Candis A. Tunilo, Esq. NiSource Corporate Services Co. 800 N. Third St., Suite 204 Harrisburg, PA 17102 <a href="mailto:ctunilo@nisource.com">ctunilo@nisource.com</a>	Joseph L. Vullo, Esq. Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704 <a href="mailto:jlvullo@bvrrlaw.com">jlvullo@bvrrlaw.com</a>
Melanie J. El Atieh, Esq. Christy M. Appleby, Esq. Harrison W. Breitman, Esq.	Steven C. Gray, Esq. Rebecca Lyttle, Esq. Office of Small Business Advocate

<p>Office of Consumer Advocate  555 Walnut Street 5th Floor,  Forum Place  Harrisburg, PA 17101-1923  <a href="mailto:MEIAtieh@paoca.org">MEIAtieh@paoca.org</a>  <a href="mailto:HBreitman@paoca.org">HBreitman@paoca.org</a>  <a href="mailto:CAppleby@paoca.org">CAppleby@paoca.org</a>  <a href="mailto:OCA2024COLGASBRC@paoca.org">OCA2024COLGASBRC@paoca.org</a></p>	<p>555 Walnut Street 1st Floor, Forum Place  Harrisburg, PA 17101-1923  <a href="mailto:sgray@pa.gov">sgray@pa.gov</a>  <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a></p>
<p>Todd S. Stewart, Esq.  Hawke McKeon &amp; Sniscak LLP  100 N. 10th Street  P.O. Box 1778  Harrisburg, PA 17105-1778  <a href="mailto:tsstewart@hmslegal.com">tsstewart@hmslegal.com</a></p>	<p>Charis Mincavage, Esq.  Kenneth R. Stark, Esq.  McNees Wallace &amp; Nurick LLC  100 Pine Street  P.O. Box 1166  Harrisburg, PA 17108-1166  <a href="mailto:cmincavage@mcneeslaw.com">cmincavage@mcneeslaw.com</a>  <a href="mailto:kstark@mcneeslaw.com">kstark@mcneeslaw.com</a></p>
<p>Thomas J. Sniscak, Esq.  Whitney E. Snyder, Esq.  Phillip D. Demanchick, Esq.  Hawke McKeon &amp; Sniscak, LLP  100 N. 10th Street  Harrisburg, PA 17101  <a href="mailto:tjsniscak@hmslegal.com">tjsniscak@hmslegal.com</a>  <a href="mailto:wesnyder@hmslegal.com">wesnyder@hmslegal.com</a>  <a href="mailto:pddemanchick@hmslegal.com">pddemanchick@hmslegal.com</a></p>	

Respectfully Submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



Ria M. Pereira, Esq., PA ID: 316771  
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Harrisburg, PA 17101  
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