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File #: 203798

April 16, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PA PUC, et al. v. Columbia Gas of Pennsylvania, Inc.
Docket Nos. R-2024-3046519, et al.**

Dear Secretary Chiavetta:

Attached for refiling please find the Prehearing Memorandum on behalf of Columbia Gas of Pennsylvania, Inc., in the above-referenced proceeding. The Company is refiling its Prehearing Memorandum in order to correct an error in the proposed litigation schedule. Specifically, the proposed litigation schedule should have indicated July 11, 2024, as the proposed date to serve rebuttal testimony.

Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl
Attachment

Rosemary Chiavetta, Secretary
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cc: The Honorable Jeffrey A. Watson (*via email; w/attachment*)
Mary Swarner, Legal Assistant (*mswarner@pa.gov*)
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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Dated: April 16, 2024


Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2024-3046519
Office of Small Business Advocate	:	C-2024-3047905
Office of Consumer Advocate	:	C-2024-3047675
	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc	:	

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

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON:

I. PROCEDURAL HISTORY

This Memorandum is submitted in response to the Prehearing Conference Order, dated April 10, 2024, advising that a Prehearing Conference is scheduled for April 17, 2024, in the above-referenced matter.

On March 15, 2024, Columbia Gas of Pennsylvania, Inc. (“Columbia”) filed with the Pennsylvania Public Utility Commission (“Commission”) Supplement No. 374 to its Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 374” or “base rate filing”). Supplement No. 374 was issued to be effective for service rendered on or after May 14, 2024. It proposed changes to Columbia’s distribution base rates designed to produce an increase in annual revenues of approximately \$124.1 million based upon data for a fully projected future test year (“FPFTY”) ending December 31, 2025. The filing was made in compliance with the Commission’s regulations, and contains all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

On April 4, 2024, the Commission issued an Order suspending Columbia's Supplement No. 374 by operation of law until December 14, 2024.¹

The Office of Consumer Advocate, the Office of Small Business Advocate, and Ronald Bernick filed formal complaints. The Pennsylvania Weatherization Providers Task Force, Inc. and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania filed petitions to intervene. The Commission's Bureau of Investigation and Enforcement filed a notice of appearance.

II. SERVICE OF DOCUMENTS

Columbia's counsel in this proceeding are Candis A. Tunilo, Esquire; Theodore J. Gallagher, Esquire, Michael Hassell, Esquire; and Megan Rulli, Esquire. Columbia requests that Michael Hassell be listed as the recipient for service. Mr. Hassell's contact information is provided below:

Michael W. Hassell (ID # 34851)
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Columbia also requests that Ms. Tunilo, Mr. Gallagher, and Ms. Rulli be added to any e-mail distribution lists in this proceeding. Ms. Tunilo's e-mail address is ctunilo@nsource.com. Mr. Gallagher's e-mail address is tjgallagher@nsource.com. Ms. Rulli's e-mail address is mrulli@postschell.com. Columbia requests that it be served with an electronic copy of all documents submitted in this proceeding.

¹ On April 5, 2024, Columbia filed Supplement No. 380 pursuant to the Commission's April 4, 2024 Suspension Order. Supplement No. 380 suspended the proposed rates contained in Tariff Supplement No. 374 until December 14, 2024.

The lead representative on behalf of Columbia for purposes of the prehearing conference will be Mr. Hassel.

III. WITNESSES AND ISSUES

Below is a list of the witnesses and the areas of their testimony comprising Columbia’s direct case in this proceeding. The subject matters listed below represent as complete a statement of issues that Columbia can provide at this stage of the proceeding. Further definition of contested issues by the parties will develop within the scope of the subject matters listed below during the course of the proceeding.

Columbia presently intends to offer the following witnesses to testify in the base rate proceeding on the following subject matters:

<u>Statement Number(s)</u>		
1	Mark Kempic President and Chief Operating Officer Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Overview of the Company filing; b) Columbia’s quality of service; and c) Management effectiveness
2	Michael E. Girata Manager of Demand Forecasting NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	a) Residential and commercial sales volumes normalization; and b) Customer usage forecasts for the future and fully projected future test years.
3	May Battig Lead Regulatory Analyst NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	a) Pro Forma operating revenues; b) Calculation of Merchant Function Charge; and c) Annualization of Forfeited Discounts.
4	Brittany Komenda Lead Regulatory Analyst NiSource Corporate Services Company 801 E. 86 th Avenue Merrillville, Indiana 46410	a) Revenue deficiency; and b) Adjustments to operation and maintenance expenses.

5	John J. Spanos President Gannett Fleming Valuation and Rate Consultants, LLC 207 Senate Avenue Camp Hill, PA 17011-2316	a) Depreciation study and service lives; and b) Annual and accrued depreciation.
6	Kevin L. Johnson Lead Regulatory Studies Analyst NiSource Corporate Services Company 290 West Nationwide Boulevard Columbus, OH 43215	a) Allocated Cost of Service Studies; b) Revenue allocation and rate design proposals; and c) Revenue Normalization Adjustment.
7	Raymond A. Brumley Director of Construction Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Plant additions through FPFTY; and b) Overview of ongoing replacement activities.
8	Paul R. Moul Managing Consultant P. Moul & Associates 251 Hopkins Road Haddonfield, NJ 08033	a) Cost of capital; and b) Fair rate of return.
9	Nicole M. Paloney Director of Rates and Regulatory Affairs Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	a) Budgeted Operations and Maintenance; and b) Expenses for the FPFTY.
10	Jennifer Harding VP Tax NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	a) Income tax expense; b) Deferred income tax; and c) Other taxes.
11	Julie Covert Lead Regulatory Analyst NiSource Corporate Services Company 290 W. Nationwide Blvd. Columbus, OH 43215	Rate Base.
12	Ribeka Danhires Manager, Rates & Regulatory Service Columbia Gas of Pennsylvania, Inc. 121 Champion Way, Suite 100 Canonsburg, PA 15317	Tariffs.

Hearings for cross-examination of all witnesses, oral rejoinder	July 31, August 1, 2, 2024
Main Briefs Due	August 20, 2024
Reply Briefs Due	Friday, August 30, 2024
End of Suspension	Saturday, December 14, 2024

Columbia has consulted with the other parties about this proposed procedural schedule. At this time, the OCA, OSBA, and CAUSE-PA have indicated their agreeability to the schedule noted above.

Columbia does not oppose a reasonable schedule of public input hearings. Columbia requests that any public input hearings be scheduled sufficiently in advance of the due date for rebuttal testimony in order that the Company may address any issues arising at the public input hearings in rebuttal.

V. DISCOVERY

To date, Columbia has been served with and has answered numerous interrogatories. Proprietary information has been requested in discovery, and Columbia intends to timely submit an appropriate Motion for Protective Order.

Columbia encourages the use of informal discovery to expedite the discovery process.

VI. SETTLEMENT DISCUSSIONS

As of this time, 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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April 16, 2024