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File #: 205143

June 3, 2024

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: Pennsylvania Public Utility Commission, *et al.* v. Peoples Natural Gas Company
LLC – 1307(f) Proceeding
Docket Nos. R-2024-3045945, *et al.***

Dear Secretary Chiavetta:

Attached for filing is the Joint Stipulation for Admission of Evidence on behalf of Peoples Natural Gas Company LLC.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Attachments

cc: The Honorable Katrina L. Dunderdale (*via email; w/attachments*)
Certificate of Service

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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kevin@pioga.org
Counsel for PIOGA

Date: June 3, 2024



Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, :
et al. :
 : Docket Nos. R-2024-3045945, *et al.*
v. :
 :
Peoples Natural Gas Company LLC :

JOINT STIPULATION FOR ADMISSION OF EVIDENCE

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

Peoples Natural Gas Company LLC (“Peoples” or the “Company”), the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), and the Pennsylvania Independent Oil & Gas Association (“PIOGA”), all parties in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners” or “Parties”), hereby submit this Joint Stipulation for Admission of Evidence in the above-captioned proceeding (the “Evidence Stipulation”). In support of the Evidence Stipulation, the Joint Petitioners represent as follows:

1. On January 31, 2024, Peoples made its Purchased Gas Cost (“PGC”) 60-day pre-filing with the Pennsylvania Public Utility Commission (“Commission”) in compliance with Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f), and the Commission’s regulations at 52 Pa. Code § 53.65.

2. On March 1, 2024, Peoples made its PGC 30-day pre-filing with the Commission in compliance with Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f), and the Commission’s regulations at 52 Pa. Code §§ 53.64, 53.65.

3. On March 15, 2024, the OSBA filed a Notice of Appearance, Formal Complaint, Public Statement, and Verification.

4. On March 20, 2024, the OCA filed a Formal Complaint and Public Statement.

5. On March 29, 2024, the Honorable Katrina L. Dunderdale (the “ALJ”) issued a Prehearing Order, scheduling a Prehearing Conference in this matter for April 8, 2024.

6. On April 1, 2024, Peoples filed its unnumbered and undated Supplement to Tariff Gas – PA PUC No. 47 for its Peoples Natural Gas Division (“PNGD”) and Retail Tariff Gas – Pa. P.U.C. No. 8 for its Peoples Gas Division (“PGD”), along with additional supporting data, exhibits, and the written direct testimony of the four witnesses listed below. The Tariff Supplement set forth the specific rates proposed by Peoples for recovery of purchases gas costs effective on October 1, 2024.

7. Also on April 1, 2024, I&E filed a Notice of Appearance.

8. On April 2, 2024, the PIOGA filed a Petition to Intervene.

9. A prehearing conference was held on April 8, 2024, as scheduled.

10. On May 1, 2024, OCA filed and served OCA Statement 1, the Direct Testimony of Jerome D. Mierzwa, along with Schedule JDM-1.

11. Also on May 1, 2024, I&E and OSBA filed letters indicating that they would not be filing Direct Testimony in this proceeding. PIOGA also did not submit Direct Testimony in this proceeding.

12. On May 20, 2024, Peoples submitted Statement Nos. 1-R and 3R, the Rebuttal Testimonies of Carol A. Scanlon and Dawn M. Folks, respectively, with accompanying Exhibits.

13. Also on May 20, 2024, I&E, OCA, and OSBA filed letters indicating that they would not be submitting Rebuttal Testimony in this proceeding. PIOGA also did not submit Rebuttal Testimony.

14. On May 23, 2024, Counsel for Peoples advised the ALJ that a Settlement in Principle had been agreed to or not opposed by all parties and requested that the Evidentiary Hearings scheduled for May 30, 2024, and June 3, 2024, be cancelled. As part of that request, Peoples' Counsel requested that the Joint Petitioners' respective pieces of testimony and exhibits be admitted into the record via Stipulation.

15. Later on May 23, 2024, the ALJ advised the parties that the Evidentiary Hearings scheduled for May 30, 2024, and June 3, 2024, would be cancelled and directed the Joint Petitioners to submit the Evidence Stipulation by Monday, June 3, 2024.

16. The Joint Petitioners request that the ALJ admit the testimony and the exhibits listed below into the record in the above-captioned proceeding:

I. Testimony and Exhibits of Peoples

17. Peoples' 30-day Prefiling, filed on March 1, 2024, containing the information submitted pursuant to 52 Pa. Code §§ 53.64(c) and 53.65 of the Commission's regulations and 66 Pa. C.S. 1317(c) in support of 66 Pa. C.S. § 1307(f) Purchased Gas Costs for 2024, sponsored as reflected in **Appendices A-D**. For ease of reference, each part of the Prefiling and its sponsor are delineated below:

FR No.	Filing Requirement	Witness ¹
53.64 (c) (1)	12 & 20 Month Supply	DMF
53.64 (c) (2)	Confidential Treatment	DMF
53.64 (c) (3)	Supply Not Chosen	SPK
53.64 (c) (4)	FERC Summary	CAS
53.64 (c) (5)	Gas Supply and Demand Projections	DMF
53.64 (c) (6)	Fuel Procurement	SPK
53.64 (c) (7)	Off System Sales & Capacity Release	SPK
53.64 (c) (8)	Transportation	DMF
53.64 (c) (9)	Transportation	DMF
53.64 (c) (10)	Schematic / Facilities	SPK
53.64 (c) (11)	Rate Structure Changes	DMF
53.64 (c) (12)	Three Day Peak Data	DMF
53.64 (c) (13)	Peak Day Methodology	DMF
53.64 (c) (14)	Min. Gas Entitlements	SPK
53.64 (i) (1)	Revenue and Expense Comparison (over/under)	DMF
53.65	Affiliated Gas Purchases	SPK

“DMF” corresponds to Dawn M. Folks; “SPK” corresponds to Steven P. Kolich; and “CAS” corresponds to Carol A. Scanlon.

18. Peoples’ April 1, 2024, Main Filing containing the computation of the annual purchased gas cost filing submitted pursuant to 52 Pa. Code §§ 53.61, et. seq., of the Commission’s regulations and 66 Pa. C.S. § 1317(c) in support of 66 Pa. C.S. § 1307(f) Purchased Gas Costs for 2023. The April 1, 2024 Main Filing includes the following direct testimony and exhibits:

- Peoples Natural Gas Company Statement No. 1 – Direct Testimony of Carol A. Scanlon
 - Peoples Natural Gas Company Exhibit Nos. 2, 3, and 15
- Peoples Natural Gas Company Statement No. 2 – Direct Testimony of Steven P. Kolich
 - Peoples Natural Gas Company Exhibit Nos. 1 (partial), 4, 6 (partial), 7 (partial), and 8 (partial)
- Peoples Natural Gas Company Statement No. 3 – Direct Testimony of Dawn M. Folks
 - Peoples Natural Gas Company Exhibit Nos. 1 (partial), 5, 6 (partial), 7 (partial), 8 (partial), 9, 10, 11, and 12
- Peoples Natural Gas Company Statement No. 4 – Direct Testimony of Lynda M. Petrichevich

- Peoples Natural Gas Company Exhibit Nos. 13 and 14

19. Peoples Natural Gas Company Statement No. 1-R – Rebuttal Testimony of Carol A. Scanlon, with Peoples Natural Gas Company Exhibit No. 15-R.

20. Peoples Natural Gas Company Statement No. 3-R – Rebuttal Testimony of Dawn M. Folks, with Peoples Natural Gas Company Exhibit No. 11-R.

II. Testimony of OCA

21. OCA Statement No. 1 – Direct Testimony of Jerome D. Mierzwa, with Schedule JDM-1.

III. Motion

22. The Joint Petitioners request that the above identified testimony and exhibits be moved into the record without a hearing. All Parties have agreed to waive cross-examination in light of the settlement and the agreement to stipulate evidence into the record.

23. Consistent with the Protective Order that was entered in this proceeding, the Parties request that all filings, statements, and exhibits designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” be placed in non-public folders by the Secretary’s Bureau of the Commission.

24. Verifications for Peoples Direct Testimony, Rebuttal Testimony, and Exhibits are attached hereto as **Appendices A-D**.

25. A verification for the direct testimony of the OCA was attached to its pre-served written testimony.

26. The admission by stipulation of the foregoing testimony and exhibits is subject to Commission approval of the Joint Petition For Settlement Of Section 1307(f) Rate Investigation that will be filed on or before June 18, 2024. The Joint Petitioners reserve their respective rights to submit additional testimony and to cross-examine witnesses in the event the Joint Petition For Settlement Of Section 1307(f) Rate Investigation is not approved or is otherwise approved with

modification causing a Party(ies) to withdraw from the Joint Petition For Settlement Of Section 1307(f) Rate Investigation and proceed to litigation.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judge Katrina L. Dunderdale admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,



Date: 06/03/2024

Anthony D. Kanagy, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601



05/31/2024
Date: _____

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building 400
North Street, 2nd Floor West
Harrisburg, PA 17105-3265



Date: 5/31/24

Melanie Joy El Atieh, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

/s/ Steven C. Gray

Date: 06/03/2024

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
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Harrisburg, PA 17101

Date: _____

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street, Suite 300
Harrisburg, PA 17101

Melanie El Atieh, Esquire
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Harrisburg, PA 17101-1923

Date: _____

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101

Date: _____



Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Assoc.
212 Locust Street, Suite 300
Harrisburg, PA 17101

Date: 5/31/2024

APPENDIX A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Office of Small Business Advocate	:	
Office of Consumer Advocate	:	
	:	Docket Nos. R-2024-3045945, <i>et al.</i>
v.	:	
	:	
Peoples Natural Gas Company LLC	:	

VERIFICATION

I, Carol A. Scanlon, being Manager, Rates for PNG Companies LLC, hereby state that the testimony set forth in Peoples Natural Gas Company Statement Nos. 1 and 1-R is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring or cosponsoring Peoples Natural Gas Company Exhibit Nos. 2, 3, 15, and 15-R, and that they are true and correct to the best of my knowledge, information, and belief. I further state that I am sponsoring the Filing Requirement contained in 52 Pa. Code § 53.64 (c)(4), as contained in Peoples Natural Gas Company LLC’s 30-day Prefiling Made on March 1, 2024, and that it is true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: June 3, 2024



Carol A. Scanlon

APPENDIX B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Office of Small Business Advocate	:	
Office of Consumer Advocate	:	
	:	Docket Nos. R-2024-3045945, <i>et al.</i>
v.	:	
	:	
Peoples Natural Gas Company LLC	:	

VERIFICATION

I, Steven P. Kolich, being Director, Gas Supply for PNG Companies LLC, hereby state that the testimony set forth in Peoples Natural Gas Company Statement No. 2 is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring or cosponsoring Peoples Natural Gas Company Exhibit Nos. 1, 4, 6, 7, and 8 and that they are true and correct to the best of my knowledge, information, and belief. I further state that I am sponsoring the Filing Requirements contained in 52 Pa. Code § 53.64 (c)(3), (6), (7), (10), and (14), and Filing Requirement 52 Pa. Code § 53.65, as contained in Peoples Natural Gas Company LLC's 30-day Prefiling Made on March 1, 2024, and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: June 3, 2024



Steven P. Kolich

APPENDIX C

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

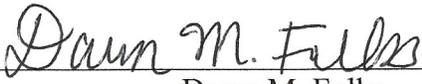
Pennsylvania Public Utility Commission	:	R-2022-3030661
Office of Small Business Advocate	:	C-2022-3031810
Office of Consumer Advocate	:	C-2022-3031853
	:	
v.	:	
	:	
Peoples Natural Gas Company LLC	:	

VERIFICATION

I, Dawn M. Folks, being Finance and Rates Analyst for PNG Companies LLC, hereby state that the testimony set forth in Peoples Natural Gas Company Statement Nos. 4 and 4-R are true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring or cosponsoring Peoples Natural Gas Exhibit Nos. 1, 5, 6, 7, 8, 9, 10, 11, 12, and 11-R, and that they are true and correct to the best of my knowledge, information, and belief. I further state that I am sponsoring the Filing Requirements contained in 52 Pa. Code § 53.64 (c)(1), (2), (5), (8), (9), (11), (12), (13), and (i)(1), as contained in Peoples Natural Gas Company LLC's 30-day Prefiling Made on March 1, 2024, and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: June 3, 2024


Dawn M. Folks

APPENDIX D

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission
Office of Small Business Advocate
Office of Consumer Advocate

:
:
:
:
:
:
:

Docket Nos. R-2024-3045945, *et al.*

v.

Peoples Natural Gas Company LLC

VERIFICATION

I, Lynda W. Petrichevich, being Senior Director, Process Operations, for PNG Companies LLC, hereby state that the testimony set forth in Peoples Natural Gas Company Statement No. 4 is true and correct to the best of my knowledge, information, and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that I am sponsoring or cosponsoring Peoples Natural Gas Exhibit Nos. 13 and 14 and that they are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 31, 2024


Lynda W. Petrichevich