
Nicholas A. Stobbe

nstobbe@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 199787

July 10, 2024

VIA ELECTRONIC FILING

The Honorable Mary D. Long
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
220 Fifth Avenue
Pittsburgh, PA 15222

**Re: Pennsylvania Public Utility Commission, et al. v. Peoples Natural Gas Company
LLC
Docket Nos. R-2023-3044549, et al.**

Dear Judge Long:

On May 30, 2024, Peoples Natural Gas Company LLC (“Peoples”), the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), the Office of Small Business Advocate (“OSBA”), the Peoples Industrial Intervenors (“PII”) and the Pennsylvania Independent Oil & Gas Association (“PIOGA”) (collectively, the “Settlement Parties”) filed a Joint Petition for Approval of Non-Unanimous Settlement among the Settlement Parties (“Non-Unanimous Settlement”) in the above-referenced Base Rate Case.

Following the May 30, 2024 Non-Unanimous Settlement filing, the Settlement Parties discovered an error in the Non-Unanimous Settlement. Specifically, in Paragraph 87 of the Non-Unanimous Settlement, it reads:

Peoples will revise its Universal Service cost recovery tariff to reflect a bad debt offset of 4.70% for all CAP participation exceeding **33,800**. Peoples will no longer track CAP participation separately for its two divisions.

(Non-Unanimous Settlement ¶ 87.)

The Settlement Parties intended the Non-Unanimous Settlement to reflect the following in Paragraph 87:

The Honorable Mary D. Long
July 10, 2024
Page 2

Peoples will revise its Universal Service cost recovery tariff to reflect a bad debt offset of 4.70% for all CAP participation exceeding **30,800**. Peoples will no longer track CAP participation separately for its two divisions.

Therefore, the Settlement Parties respectfully request that Your Honor consider the above-adjustment to the Non-Unanimous Settlement Agreement, rather than the as-filed Non-Unanimous Settlement (33,800; Non-Unanimous Settlement ¶ 87). The correct figure (*i.e.*, 30,800) is reflected in the Peoples Natural Gas Company LLC Supplement No. 2 to Gas – PA PUC No. 48, First Revised Page No. 76, which was included as part of **Appendix A** to the Non-Unanimous Settlement. Similarly, the correct number is reflected in Peoples witness Carol A. Scanlon’s Rebuttal Testimony. *See* Peoples St. No. 3-R, p. 38.

Peoples has consulted with the Settlement Parties and none oppose the incorporation of this change to the Non-Unanimous Settlement. Peoples notes that the Office of Consumer Advocate (“OCA”) opposes the Non-Unanimous Settlement.

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

Respectfully submitted,



Nicholas A. Stobbe

NAS/kl

cc: 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 EMAIL AND/OR FIRST-CLASS MAIL

Steven C. Gray, Esquire
Rebecca Lyttle, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov

Gina L. Miller, Esquire
Harrison Breitman, Esquire
Jacob D. Guthrie, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
gmliller@paoca.org
hbreitman@paoca.org
jguthrie@paoca.org
OCAPNG2023BRC@paoca.org

Scott Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P. O. Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas Asso.
212 Locust Street, Suite 600
Harrisburg, PA 17101-1510
kevin@pioga.org
PIOGA

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Ria M. Pereira, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
*Coalition for Affordable Utility Services and
Energy Efficiency in Pennsylvania*

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
*Pennsylvania Weatherization Providers
Task Force Inc.*

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Kenneth R. Stark, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
kstark@mcneeslaw.com
Peoples Industrial Intervenors

Terri Grinner
811 Robin Drive
Pittsburgh, PA 15220
mtgrinner@aol.com

Lawrence Feder
4028 Park Place
Glenshaw, PA 15116
Larry_feder@yahoo.com

Daniel Killmeyer
184 McKay Road
Saxonburg, PA 16056
Dandan4863@gmail.com

Rachel Havrilla
708 Bellaire Avenue
Pittsburgh, PA 15226
Rachelhavrilla92@gmail.com

Mary Frey
904 Race Street
Altoona, PA 16601

William A. Weis
989 Waldwick Drive
Pittsburgh, PA 15237

Representative Frank Burns
House of Representatives
72nd Legislative
PO Box 202072
332 Main Capitol
Harrisburg, PA 17120
repburns@pa.house

Date: July 10, 2024



Anthony D. Kanagy