
Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 203798

October 8, 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: Pennsylvania Public Utility Commission, et al. v. Columbia Gas of Pennsylvania, Inc.
Docket Nos. R-2024-3046519, et al.

Dear Secretary Chiavetta:

Attached for filing, please find the Exceptions of Columbia Gas of Pennsylvania, Inc. to the Recommended Decision in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/skr
Attachment

cc: Honorable Jeffrey A. Watson (*via e-mail*)
Mary Swarner, Legal Assistant (*via e-mail*)
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

Scott B. Granger, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
sgranger@pa.gov

Melanie J. El Atieh, Esquire
Christy M. Appleby, Esquire
Harrison W. Breitman, Esquire
Emily A. Farren, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
melatieh@paoca.org
cappleby@paoca.org
hbreitman@paoca.org
efarren@paoca.org

Elizabeth R. Marx, Esquire
Ria M. Pereira, Esquire
John W. Sweet, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

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

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for PWPTF

Whitney E. Snyder, Esquire
Thomas J. Sniscak, Esquire
Phillip D. Demanchick, Jr., Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
wesnyder@hmslegal.com
tjsniscak@hmslegal.com
pddemanchick@hmslegal.com
Counsel for The Pennsylvania State University

David E. Dismukes
Acadian Consulting Group
5800 One Perkins Place Drive
Suite 5-F
Baton Rouge, LA 70808
OCA2024COLGASBRC@paoca.org
Consultant for OCA

VIA EMAIL AND FIRST-CLASS MAIL

Daniel E. Skvarla
202 Hazen Avenue North
Ellwood City, PA 16117
daneteetime@gmail.com

Ronald T. Bernick
34 Lodge Street
Pittsburgh, PA 15227
Rbernick1970ss@gmail.com

Philip L. Bloch
341 Ridge Avenue
McSherrystown, PA 17344
philipleebloch@gmail.com

Linda Allison
522 Pacific Avenue
York, PA 17404
xdiver@verizon.net

Dated: October 8, 2024



Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2024-3046519
Officer of Consumer Advocate	:	C-2024-3047675
Office of Small Business Advocate	:	C-2024-3047905
Ronald T. Bernick	:	C-2024-3048339
Linda Allison	:	C-2024-3048588
Philip Bloch	:	C-2024-3048478
Pennsylvania State University	:	C-2024-3048624
Daniel E. Skvarla	:	C-2024-3049677
	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**EXCEPTIONS OF COLUMBIA GAS OF PENNSYLVANIA, INC.
TO RECOMMENDED DECISION**

Theodore J. Gallagher (ID # 90842)
Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Canonsburg, PA 15313
Phone: 724-809-0525
E-mail: tjgallagher@nisource.com

Candis A. Tunilo (ID #89891)
800 North 3rd Street
Suite 204
Harrisburg, PA 17102
Phone: 223-488-0794
E-mail: ctunilo@nisource.com

Michael W. Hassell (ID # 34851)
Megan Rulli (ID # 331981)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
Phone: 717-731-1970
E-mail: mhassell@postschell.com
E-mail: mrulli@postschell.com

Date: October 8, 2024

Counsel for Columbia Gas of Pennsylvania, Inc.

TABLE OF CONTENTS

	Page
I. INTRODUCTION.....	1
II. EXCEPTIONS.....	4
A. EXCEPTION NO. 1 – THE RD ERRS IN REJECTING THE MLC (RD 88-118).....	4
1. THE RD INCORRECTLY ASSUMES THAT PIECEMEAL LITIGATION IS AN EFFECTIVE ALTERNATIVE TO THE MLC.	4
2. THE RD INCORRECTLY PERCEIVES THAT THE MLC WILL REGULATE MUNICIPAL RESTORATION DECISIONS.....	5
3. THE RD FAILS TO CREDIT COLUMBIA’S EVIDENCE THAT INCREASING MUNICIPAL REQUIREMENTS SHIFT COSTS TO COLUMBIA’S CUSTOMERS.	6
4. THE RD ERRS IN CONCLUDING THAT THE MLC IS IMPERMISSIBLY DISCRIMINATORY AND IMPROPERLY SHIFTS COSTS.	9
III. CONCLUSION	12

TABLE OF AUTHORITIES

Page(s)

Pennsylvania Court Decisions

Pittsburgh v. Pa. PUC, 106 Pa. Commonwealth Ct. 437, 526 A.2d 1243 (1986).....9, 10

Pennsylvania Administrative Agency Decisions

Petition of Columbia Gas of Pennsylvania, Inc. for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan and Approval of its Second Long-Term Infrastructure Improvement Plan, Docket No. P-2017-2602917 (Order entered September 21, 2017)6

Pennsylvania Statutes

67 Pa. Code § 459.87

I. INTRODUCTION

On October 1, 2024, the Pennsylvania Public Utility Commission issued the Recommended Decision (“RD”) of Administrative Law Judge Jeffrey A. Watson (the “ALJ”) with regard to Columbia Gas of Pennsylvania, Inc.’s (“Columbia” or the “Company”) base rate proceeding at Docket No. R-2024-3046519. The RD recommends approval of the Joint Petition for Settlement (“Settlement”) that was entered into, or unopposed by, all active parties to the proceeding. As indicated in the RD, the Settlement resolved all issues in this case, exclusive of the Company’s proposed Municipal Levelization Charge (“MLC”), which was reserved for litigation. The RD recommends approval of the Settlement and rejection of the MLC. Columbia hereby files these Exceptions to the ALJ’s recommended denial of the MLC.

As explained in detail in Columbia’s Main Brief (“MB”) and Reply Brief (“RB”), and as further discussed herein, the purpose of the MLC is to use the rate design process to discourage municipalities from adopting increasingly onerous street restoration requirements. Columbia has a robust main replacement program, which has accelerated the replacement of cast iron, bare steel and first-generation plastic pipe (“priority pipe”) in the interest of safety and to reduce methane gas releases. Since 2007, Columbia has replaced over 1,800 miles of priority pipe. However, Columbia still has a substantial number of mains and bare steel customer services remaining to be replaced. Columbia St. No. 1, pp. 14-15. Columbia’s customers bear the cost, through depreciation and return, of these main and service line replacements, and the lower the cost per foot of replacements, the less of a burden there ultimately is on customers and the faster the replacements can be completed.

Over the past fifteen years, the cost per foot to replace pipe has increased from \$81.25 to \$289. Some of this increase can be explained by inflationary increases in material, supplies and labor, which are to be expected. However, a major driver of this increase is due to costs for

restoration and permitting fees mandated by local ordinances. Columbia faces ever increasing permit fees for opening streets, and more and more demands that restoration go beyond returning the roads and adjacent property to their status before the main replacement. Some of these demands far exceed the restoration requirements and permitting fees that the Pennsylvania Department of Transportation (“PennDOT”) enforces for state highways. In testimony and briefs, Columbia offers a number of examples where local municipalities demand local street restoration far in excess of what is required for state highways, including requirements that paving be 4 inches thick instead of the PennDOT required 1½ inches, and that streets be paved curb to curb or at distances well beyond the area of Columbia’s street cut, again beyond what PennDOT requires for state roads.

The MLC is a modest, revenue neutral proposed pilot, intended to test whether rate design can encourage municipalities to reduce their restoration demands. As a pilot, Columbia proposes to limit the initial MLC to municipalities that have requirements which are substantial outliers from PennDOT paving requirements. Columbia identified two municipalities, the City of Pittsburgh and the Borough of Perryopolis, with excessive paving requirements and who would not agree to negotiate lower requirements, and two municipalities, New Sewickley Township and Roscoe Borough, whose restoration standards permit restoration back to original condition, which is less than the PennDOT standards. Next, Columbia determined the costs above PennDOT standards for the City of Pittsburgh and the Borough of Perryopolis. To determine the incremental costs above PennDOT standards for the City of Pittsburgh, Columbia compared the average cost of the 3.5- and 4.0-inch mill and overlay (“M&O”) requirement of the City of Pittsburgh to the average cost of 1.5-inch M&O, which is the PennDOT standard. Columbia St. No. 9, p. 18. The difference was applied to the number of yards paved for the

period 2021-2023, resulting in excess costs for paving only of \$1.3 million.¹ A similar calculation was prepared for the Borough of Perryopolis, except that the Borough requires a 2.0-inch M&O. This resulted in additional costs of approximately \$54,000. Columbia St. No. 9, p. 19. Because these are capital costs, Columbia calculated the resulting annual revenue requirement for these municipalities above PennDOT standards and divided by the total number of annual bills of customers located in those two municipalities to determine the charge, which is \$0.70 per bill. Columbia St. No. 9, p. 19. In order to maintain revenue neutrality and to implement a simple pilot, the excess revenue requirement amount produced from the MLC to customers in the City of Pittsburgh and the Borough of Perryopolis was divided by the number of customers in Roscoe Borough and New Sewickley Township, resulting in a monthly credit of \$7.44 per bill. Columbia St. No. 9, p. 19.

It is important to emphasize that Columbia is not proposing a tracking mechanism with the MLC. That is, Columbia is not proposing to track the actual restoration costs incurred in each municipality and set rates for each municipality based on those costs. Nor is Columbia proposing a reconciliation mechanism. The MLC is a simple rate design approach to recognize that, for the identified municipalities, excessive restoration demands, which benefit the customers in the municipalities that impose these requirements, should be borne by those customers. Columbia plans to gain experience with administering the revenue neutral charge/credit for these four municipalities. In future rate cases, Columbia will examine the impact of the charge in affecting choices made regarding restoration and fee ordinances before determining whether to propose expanding the charge to other municipalities. Columbia St. No. 9, p. 19.

¹ This figure does not take into account other excessive restoration requirements or permit fees.

II. EXCEPTIONS

A. **EXCEPTION NO. 1 – THE RD ERRS IN REJECTING THE MLC (RD 88-118)**

The RD offers several reasons for rejecting the RD. However, the reasoning misunderstands the purpose and intent of the MLC, incorrectly assumes Columbia has available alternatives to the MLC, and erroneously concludes that the MLC results in unreasonable rate discrimination.

1. **The RD incorrectly assumes that piecemeal litigation is an effective alternative to the MLC.**

The RD, at pp. 104-107, asserts that the MLC is not necessary because Columbia has available to it litigation to challenge excessive municipal requirements. Columbia has explained in briefs and testimony its extensive efforts to attempt to negotiate and, where viable, litigate excessive permitting fees and requirements. Columbia MB, pp. 9-11.² However, as Columbia explained in its testimony and briefs, litigation is only a limited, and in many instances, ineffective option to the MLC.

Initially, it is important to recognize that Columbia provides natural gas service in approximately 450 municipalities. Columbia St. No. 1, p. 20. It is unreasonable to conclude that Columbia can bring challenges to the restoration requirements in the numerous main repair and replacement projects it undertakes annually across its system. Many projects are small, and the cost of litigating each project in multiple municipalities could well exceed the increased project cost for small projects. Further, litigation may not be viable for the various projects undertaken each year without substantial project lead times, such as main breaks. While the RD asserts that Columbia can “request that the litigation be expedited, where necessary” (RD, p. 106), no

² The RD, at p. 110, states that Columbia failed to provide details regarding actions undertaken by Columbia to challenge excessive restoration requirements. This overlooks the extensive testimony provided on this point by several Columbia witnesses in Columbia Statement Nos. 1 and 7.

litigation can ever be expedited enough to address projects that may need to be undertaken in days, weeks, or even months.³ Further, some municipal requirements may exceed PennDOT requirements, and add to the rate burden of Columbia’s customers, but still may be upheld as not “excessive” under applicable precedent cited by the RD. Litigation, while an important tool that is being used by Columbia, is not a solution to the problem of increasing municipal restoration requirements.

2. The RD incorrectly perceives that the MLC will regulate municipal restoration decisions.

The RD, at p. 107, asserts that where litigation is an option, “it is unclear why the Commission would or could step in and regulate these issues when these issues are being appropriately addressed by the Common Pleas Courts and appellate courts.” This statement misperceives the intent and operation of the MLC. The MLC does not seek to have the Commission litigate challenges to municipal fees or restoration requirements. Nor does it seek to have the Commission order municipalities to adopt PennDOT requirements. Rather, the MLC simply applies cost causation rate design principals to set higher rates for customers in municipalities with restoration requirements that exceed PennDOT standards and set lower rates for customers in municipalities that have restoration requirements below PennDOT standards. If a municipality adopts an ordinance that requires excessive restoration requirements, Columbia’s customers within the municipality will bear the increased cost of that decision.

³ In a pending challenge by Columbia to certain ordinances of Menallen Township, Fayette County, litigation remains pending before the Commonwealth Court two years after filing. Columbia MB, p. 11.

3. The RD fails to credit Columbia's evidence that increasing municipal requirements shift costs to Columbia's customers.

The RD, at p. 109, asserts that Columbia failed to submit sufficient evidence to establish that municipal requirements had the effect of shifting costs from taxpayers in certain municipalities to Columbia customers in other municipalities. Columbia respectfully disagrees.

Initially, Columbia notes that the Commission has already recognized that increasing restoration requirements imposed by certain municipalities have adversely affected Columbia's customers by increasing rate base. In its Order at *Petition of Columbia Gas of Pennsylvania, Inc. for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan and Approval of its Second Long-Term Infrastructure Improvement Plan*, Docket No. P-2017-2602917 (Order entered September 21, 2017), p. 8, the Commission concluded:

Regarding the increasing costs from changing restoration requirements being imposed by local governments and municipalities, the Commission requested additional information from Columbia. Columbia filed responses on August 4, 2017, and August 9, 2017. In its responses, Columbia provided examples of where the magnitude of restoration costs increased in certain portions of their service territory, based on projects completed both before and after the new ordinances or requirements were put in place. Based on the data provided, it appears there are significant cost increases associated [with] changes in municipal restoration requirements. The changes vary in each municipality, with some changes resulting in only relatively modest increases in restoration costs of 20% to 30%, while others increased significantly by 50% to 80%. In some instances, the restoration costs per mile more than doubled.

Based on this information provided by Columbia, it appears that these changing restoration requirements are a significant driver of Columbia's cost increases. It is likely that a portion of Columbia's 97% cost increase in 2017 over its original projections is attributable to these restoration cost increases. Columbia has demonstrated that it has put measures in place in an attempt to control these costs and restoration requirement changes when possible. However, the Company cannot prevent a local government body or official from enacting ordinances as they see fit to govern their township, borough, or city. While Columbia is attempting to do as much as it can to mitigate these costs, the Commission recognizes that such costs are, to some extent, out of the Company's control.

Columbia's President, Mr. Kempic, gave several examples of excessive restoration requirements, and the cost consequences of those requirements. Columbia St. No. 1, pp. 19-20. For example, for two proposed pipeline projects in one Pennsylvania township, Columbia calculated the permitting and restoration costs demanded by the township compared to what would be required under PennDOT requirements. Under PennDOT requirements, the permit fees for these projects would be \$2,510; however, under the township's ordinance, permitting and engineering fees would be \$143,740. This increase in costs is capitalized as part of the restoration project and is borne by all of Columbia's customers.

Another example involved the M&O requirements of many municipalities. Under the PennDOT requirements,⁴ disturbed roadways must be restored by milling and overlaying the traffic lane in which an opening or openings were made by using paving at 1.5 inches thick. If four or more openings were made that cross the street within 100 linear feet, the utility must overlay the entire disturbed area, which is commonly called "curb to curb" restoration. Some municipal ordinances require curb to curb paving and 3.5" or even 4" overlay paving thickness in virtually all circumstances. These requirements to pave far beyond the area disturbed by gas pipeline construction and in thicknesses that are far greater than what is required on a state highway unnecessarily increase costs for Columbia's customers across the state. The proposed MLC rate calculated that for the City of Pittsburgh alone, this increased paving requirement above PennDOT standards added \$1.3 million in costs that are borne by customers in municipalities without such a requirement. These are essentially municipal paving costs that are more appropriately borne by the citizens of the municipality demanding the additional paving rather than utility ratepayers.

⁴ See 67 Pa. Code § 459.8.

A third example is a borough that requires curb to curb paving plus paving 25 feet on both sides of a street cut. Columbia likewise compared the costs under the PennDOT requirements to what the cost would be under the borough's ordinance. If the PennDOT permitting and restoration requirements would be applied, Columbia's customers would be responsible for \$260,000 in paving and restoration costs. However, under the borough's demands, customers are ultimately responsible for paying \$470,000 for permitting and restoration - nearly double the cost. This is evidence, disregarded by the RD, of increased costs charged to Columbia's customers due to excessive municipal restoration requirements.

The RD, at p. 109, further asserts that Columbia failed to demonstrate that any specific provisions of any municipality's ordinances were unfair or improper. Again, the RD misperceives the purpose of the MLC. Columbia does not seek to have the Commission determine, on a case-by-case basis, whether a municipal ordinance is illegal under established precedent. Rather, the MLC uses state highway standards as a baseline, and provides that customers in municipalities that exceed that baseline will be charged an additional rate based upon the excess cost. Where, as is currently the case, parties express concerns about affordability, it is appropriate for Columbia to propose, and the Commission to adopt, a pilot program designed to encourage municipalities to control their restoration demands.

The RD, at pp. 111-112, poses the argument that there can be a number of variables that affect the costs incurred in different municipalities. However, the issue raised by the MLC is whether Columbia's customers in other municipalities should bear the costs of those requirements that exceed PennDOT standards.

The Commission should reject the RD's assertion that there is insufficient evidence to conclude that excessive restoration requirements are detrimental to Columbia's customers.

4. The RD errs in concluding that the MLC is impermissibly discriminatory and improperly shifts costs.

The RD, at pp. 112-117, concludes that that the proposed MLC would create impermissible cost shifting and creates improper geographic rate discrimination. As explained in Columbia's MB and RB, such conclusion improperly applies the non-discrimination standards of the Public Utility Code.

In this case, the MLC establishes a reasonable rate differential between localities, based upon clear economic facts. The record unequivocally demonstrates that in the localities of the City of Pittsburgh and the Borough of Perryopolis, Columbia is incurring substantial additional costs per mile of pipe replaced due to excessive paving requirements imposed by local ordinances that are over 300% greater than PennDOT standards. The substantial additional investment resulting from these excessive restoration requirements will continue to increase Columbia's rates to all its customers in the future, as it has over 172,000 feet of priority pipe to replace in the City of Pittsburgh and the Borough of Perryopolis alone. Columbia St. No. 1-R, p. 12.

Further, the MLC is justified by non-cost considerations. Customers located in the City of Pittsburgh and Borough of Perryopolis are receiving the benefit of better roads without concomitant tax increases because these municipalities' excessive restoration requirements are being charged to Columbia and its entire customer base.

Moreover, the \$0.70 per bill charge under the MLC cannot be considered unreasonably high and discriminatory. In *Pittsburgh v. Pa. PUC*, 106 Pa. Commonwealth Ct. 437, 526 A.2d 1243 (1986), the City of Pittsburgh opposed a rate design that increased rates to customers within the City above what the City believed were justified on a cost basis. The Court rejected this argument, stating:

To prove unreasonable discrimination, the city must show that certain customers "are paying an unreasonably high rate thereby giving an advantage to other residential customers who are paying unreasonably low rates." Philadelphia Electric Co. at 452-53, 470 A.2d at 658. However, because the difference between the commission's approved rates and the city's proposed rates, for an average residential customer, results in a \$1.84 per year difference, the commission found that difference to be de minimis and correctly concluded that the city failed to meet its burden of proving discrimination.

526 A.2d at 1247-48. Similarly here, a \$0.70 per month differential for City of Pittsburgh and Borough of Perryopolis customers due to excessive restoration cost requirements is a small differential to pay.

The RD further criticizes the MLC for singling out one cost driver that produces a 1% rate change and ignoring cost differences for the remaining 99% of cost of service. However, as explained in Columbia's MB at p. 15, Columbia is not seeking to propose separate cost allocation studies for all of its 450 municipalities. As part of this pilot, it has identified one significant driver, differences in paving overlay requirements, and developed a charge applicable to municipalities with significantly different requirements that refuse to negotiate more reasonable terms. Columbia St. No 1-R, p. 11.

The RD further criticizes the MLC as improper because the excessive restoration costs are included in the cost to serve all Columbia customers, but the MLC credit is only provided to a small subset of customers. However, this criticism fails to take into account that the MLC is proposed as a pilot. The intent of the MLC is not only to test whether municipalities will respond to their constituents' pressures to moderate excessive restoration demands, but also whether they will be incented to repeal restoration standards if there is a potential that rates to customers within the municipality will be lower. Columbia St. No. 1-R, p. 10. As Columbia's President, Mr. Kempic, explained:

Columbia's proposed MLC will provide the Commission, the statutory intervenors, and Columbia with valuable information concerning the impact of communicating the cost of restoration to customers. Columbia believes that the MLC can help to spur municipalities to accept reasonable PennDot permitting and restoration standards when customers living in those municipalities - along with the municipal leaders - are made aware of the financial impact those municipal ordinances are having on their gas utility bills.

Columbia St. No. 1-R, p. 10. In future proceedings, if the MLC proves to be successful, it can be further refined to address continued cost disparities caused by excessive restoration requirements. Moreover, if successful, the MLC **will** benefit all customers in the future, as they will be relieved of additional investment in excessive, municipality-required, restoration costs, and the need for geographically delineated rates will be reduced or eliminated.

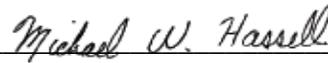
Finally, the RD criticizes the MLC as "discriminatory" because it proposes to charge the same rate to all customer classes in the affected municipality. However, as Columbia explained, there are no class cost differences in municipal requirements that direct thicker asphalt paving than PennDOT requires. There are no different paving requirements depending on the classes of customers that abut a street. Moreover, if the Commission believes there is merit to this argument, the solution is not to reject the MLC. Columbia provided a calculation of per class charges and credits, reproduced on page 116 of the RD, that could be adopted.

For the reasons explained above, and in Columbia's MB and RB, the proposed MLC is just and reasonable, and addresses an issue of substantial concern as Columbia continues to repair and replace priority pipe throughout its system. The MLC should be approved as a pilot program.

III. CONCLUSION

For all the foregoing reasons, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Pennsylvania Public Utility Commission adopt the RD's recommendation to approve the Settlement in its entirety, grant the above Exceptions and approve the Company's proposed MLC.

Respectfully submitted,



Theodore J. Gallagher (ID # 90842)
Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Canonsburg, PA 15313
Phone: 724-809-0525
E-mail: tjgallagher@nisource.com

Michael W. Hassell (ID # 34851)
Megan Rulli (ID # 331981)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
Phone: 717-731-1970
E-mail: mhassell@postschell.com
E-mail: mrulli@postschell.com

Candis A. Tunilo (ID #89891)
800 North 3rd Street
Suite 204
Harrisburg, PA 17102
Phone: 223-488-0794
E-mail: ctunilo@nisource.com

Date: October 8, 2024

Counsel for Columbia Gas of Pennsylvania, Inc.