



Todd S. Stewart
717.703.0800
tssstewart@hmslegal.com

Regulation is a maze. We can show you the way!

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

October 17, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Interstate Gas Supply, LLC; Docket Nos. A-2011-2228643; Utility Code: 1113238;
**RESPONSES OF INTERSTATE GAS SUPPLY, LLC TO DATA
REQUESTS OF THE STAFF**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Data Responses of Interstate Gas Supply, LLC d/b/a IGS Energy to the Data Requests of the Staff in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over the closing text.

Todd S. Stewart
*Counsel for Interstate Gas Supply, LLC d/b/a
IGS Energy*

TSS/jld/das

Enclosure

cc: Jeff McCracken, Bureau of Technical Utility Services (via email – jmccracken@pa.gov)
Lauren Wolfe (via email – lauren.wolfe@igs.com)

**RESPONSES OF INTERSTATE GAS SUPPLY, LLC
TO DATA REQUESTS
OF THE STAFF**

Docket No. A-2011-2228643

1. Reference Application, Section 6.a and 6.b, Certificate of Service – Applicant is required to provide a Certificate of Service showing proof of service of this amendment (template attached) on the five statutory agencies and all electric distribution companies in which the licensee is licensed to operate. Please provide this documentation.

RESPONSE:

See attached Certificate of Service for those filings as well as this filing.

Provided by: Counsel.



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

ATTORNEYS AT LAW

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

August 6, 2024

VIA OVERNIGHT MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Docket No. A-2011-2228643; Utility Code: 1113238; **REDUCED BONDING/SECURITY LEVEL FOR INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

On August 4, 2015, Interstate Gas Supply, Inc. (“IGS”) filed a Petition with the Pennsylvania Public Utility Commission (“Commission”) seeking a reduction in the level of its required bond from 10% to 5% of its most recent twelve (12) months of revenue, pursuant to the Commission’s Order entered July 24, 2014, Docket No. M-2013-2393141. By Secretarial Letter issued on November 6, 2015, the Commission granted IGS’ request and allowed it to reduce its bond to 5% of gross annual operating revenues. On October 6, 2016, IGS made a similar filing, requesting that the Commission continue its required bonding level at 5% for the subsequent 12-month period. That request was made at the same docket. IGS’ request was granted by Secretarial Letter dated November 23, 2016. The same requests were made in 2017, 2018, 2019, 2020, 2022, and 2023 and all were granted.

The purpose of this letter is to request that the Commission extend the reduced bonding level of 5% for IGS, for 12-months following the expiration of its current bond on November 6, 2024. IGS avers that it continues to qualify for the reduced level. By this letter, IGS transmits the appropriate information to the Commission so that the Commission may review its request.

IGS also requests that this Letter and the attachments hereto be treated as **CONFIDENTIAL** by the Commission as the documents contain competitively sensitive information. Accordingly, IGS provides the following statements and **CONFIDENTIAL** attachments identified below as required by the Commission when considering such requests:

1. Statements of Accounts from the Pennsylvania Department of Revenue are attached as **Attachment 1.1**. These statements indicate that IGS is current with all obligations with the Department but one – Gross Receipts Tax. IGS’ GRT liability for 2023 is currently under appeal with the Department of Revenue as demonstrated by **Attachment**

1.2 which is the REV-65 (appeal) filed by IGS with the Board of Appeals on or about June 20, 2024.

2. Documentation that IGS has electronically prepaid its Gross Receipts Tax for 2024 is attached as **Attachments 2.1 and 2.2**;

3) A spreadsheet showing gross receipts for each of the EDC service territories for the most recent twelve (12) month period, which also includes the calculation of the 5% amount is attached as **Attachment 3**;

4. An original raised-seal, wet signature bond in the appropriate amount is attached as **Attachment 4**;

5. IGS' Contact information for regulatory matters is:

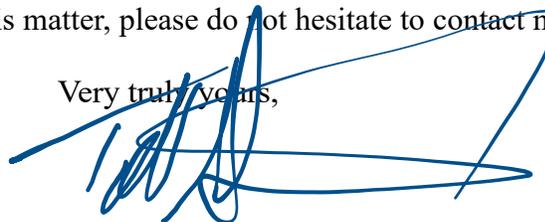
Lauren Wolfe
Director, Legislative & Regulatory Affairs
Interstate Gas Supply, Inc.
6100 Emerald Parkway,
Dublin, OH 43016
(724)-793-0314
Lauren.Wolfe@igs.com

6. IGS certifies that to the best of its knowledge it is compliant with the requirements of the Alternative Energy Portfolio Standards Act and has paid all required assessments and fees imposed by the Commission.

Accordingly, IGS requests that its financial security requirements remain at the current 5% level for the coming year.

If you have any questions concerning this matter, please do not hesitate to contact me.

Very truly yours,



Todd S. Stewart
Counsel for
Interstate Gas Supply, Inc. d/b/a IGS Energy

TSS/jld
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST-CLASS MAIL

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Duquesne Light Company
Regulatory Affairs
411 Seventh Street, MD 16-4
Pittsburg, PA 15219

Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Pike County Light & Power Company
Vice President-Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Office of Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Citizens Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

PECO Energy Company
Manager Energy Acquisition
2301 Market Street
Philadelphia, PA 19101-8699

West Penn Power d/b/a Allegheny Power
Legal Department
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Wellsboro Electric Company
Attn: EGS Coordinator
33 Austin Street
PO Box 138
Wellsboro, PA 16901

FirstEnergy
Legal Department
2800 Pottsville Pike
Reading, PA 19612

VIA ELECTRONIC MAIL

Carol Scanlon
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Carol Scanlon
Peoples Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Joanne E. Maciok
National Fuel Gas Distribution Corp.
6363 Main Street
Williamsville, NY 14221
maciokij@natfuel.com

Mr. Ryan Reeves, Director Supply
Transportation & Control
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
pgwchoicesupply@pgworks.com

Columbia Gas of PA, Inc.
Transport Support Services
290 W. Nationwide Blvd.
Columbus, OH 43215
transportevaluations@nisource.com

Sherry Epler
UGI Utilities, Inc. – Gas Division
1 UGI Drive
Denver, PA 17517
sepler@ugi.com

Ed Rogers
Valley Energy Inc.
523 South Keystone Avenue
Sayre, PA 18840-0340
erogers@ctenterprises.org

Carlos Thillet
Manager, Gas Supply and Transportation
PECO
2301 Market Street, S9-2
Philadelphia, PA 19103
Carlos.thillet@exeloncorp.com



Todd S. Stewart

DATED: October 17, 2024

**RESPONSES OF INTERSTATE GAS SUPPLY, LLC
TO DATA REQUESTS
OF THE STAFF**

Docket No. A-2011-2228643

2. Regarding Annual and Supplemental Fees - Applicant must be current with all annual fees and supplemental annual fees being owed to the Commission. Please contact pucassessments@pa.gov to make arrangements to pay all outstanding fees and then respond to this data request with the date the fees were paid.

RESPONSE: IGS paid its annual assessments recently and the Commission issued an additional – supplemental assessment - on October 10, 2024. Payment for that assessment has been made but has not yet been received or recorded by the Commission as of the date of this response.

Provided by: Counsel

From: [PC,PUCAssessments](#)
To: [Todd Stewart](#)
Subject: RE: [External] Interstate Gas Supply - UC - 1113238
Date: Thursday, October 17, 2024 11:14:10 AM

Todd,

The check has been located and will be applied to your account today. Sorry for the delay – not sure if it was at the post office or at the PUC.

Thanks,
Diane

From: Todd Stewart <TSSStewart@hmslegal.com>
Sent: Wednesday, October 16, 2024 2:28 PM
To: PC,PUCAssessments <RA-PCPUCASSESSMENTS@pa.gov>
Subject: RE: [External] Interstate Gas Supply - UC - 1113238

Diane

Our carrier records show that the check arrived at the Commission as of 9 15, yesterday. Can you please confirm and confirm a zero balance asap. Thanks,.

Todd S. Stewart | Partner

HMS Legal LLP

Phone : +1.717.236.1300 | Direct: +1.717.703.0806

From: PC,PUCAssessments <RA-PCPUCASSESSMENTS@pa.gov>
Sent: Tuesday, October 15, 2024 12:56 PM
To: Todd Stewart <TSSStewart@hmslegal.com>
Subject: RE: [External] Interstate Gas Supply - UC - 1113238

Todd,

Interstate Gas Supply (1113238) has an outstanding invoice in the amount of \$22,320.00 for a supplemental fee. Please advise the company to pay as soon as possible.

Thanks,

Diane Kennedy | Fiscal Management Specialist 1
Public Utility Commission | Bureau of Administrative Services
Keystone Building | Room N 303
400 North Street | Harrisburg, PA 17120
Phone: 717.772.0316 | Fax: 717.231.4770
www.puc.pa.gov

From: Todd Stewart <TSSStewart@hmslegal.com>
Sent: Tuesday, October 15, 2024 11:48 AM
To: PC,PUCAssessments <RA-PCPUCASSESSMENTS@pa.gov>
Subject: [External] Interstate Gas Supply

***ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

I am inquiring if IGS has satisfied all outstanding invoices for assessments and fees from the Commission?

Todd S. Stewart | Partner

HMS Legal LLP

501 Corporate Circle, Suite 302 | Harrisburg, PA 17110

Phone : +1.717.236.1300 | Direct: +1.717.703.0806

Assistant: Jennifer Deitch | +1.717.703.0818 | jldeitch@hmslegal.com

www.hmslegal.com | Email: tsstewart@hmslegal.com

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Interstate Gas Supply, LLC
To: Commonwealth of Pennsylvania COMM006

Check Number: 0000053553
Date: 10/16/2024

Invoice Number	Date	Description	Amount	Discount	Paid Amount
24-1113238-1	10/10/2024		\$22,320.00	\$0.00	\$22,320.00

TOTALS: \$22,320.00 \$0.00 \$22,320.00



Interstate Gas Supply, LLC
Accounts Payable
6100 Emerald Parkway
Dublin, OH 43016
(614) 659-5430

Wells Fargo Bank, N.A.
San Francisco, CA
11-24/1210

0000053553

Pay Twenty Two Thousand Three Hundred Twenty Dollars And 00 Cents

DATE: Oct 16, 2024
AMOUNT: \$22,320.00

to the Order of:

Commonwealth of Pennsylvania

400 North Street
BAS - Fiscal Section
Harrisburg, PA 17120

Interstate Gas Supply, LLC
To: Commonwealth of Pennsylvania COMM006

Check Number: 0000053553
Date: 10/16/2024

Invoice Number	Date	Description	Amount	Discount	Paid Amount
24-1113238-1	10/10/2024		\$22,320.00	\$0.00	\$22,320.00

TOTALS: \$22,320.00 \$0.00 \$22,320.00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST-CLASS MAIL

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Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

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Harrisburg, PA 17120

Citizens Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

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2301 Market Street
Philadelphia, PA 19101-8699

West Penn Power d/b/a Allegheny Power
Legal Department
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Wellsboro Electric Company
Attn: EGS Coordinator
33 Austin Street
PO Box 138
Wellsboro, PA 16901

FirstEnergy
Legal Department
2800 Pottsville Pike
Reading, PA 19612

VIA ELECTRONIC MAIL

Carol Scanlon
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Carol Scanlon
Peoples Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Joanne E. Maciok
National Fuel Gas Distribution Corp.
6363 Main Street
Williamsville, NY 14221
maciokij@natfuel.com

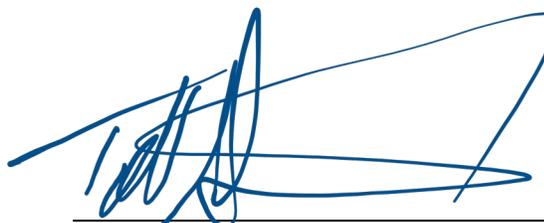
Mr. Ryan Reeves, Director Supply
Transportation & Control
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
pgwchoicesupply@pgworks.com

Columbia Gas of PA, Inc.
Transport Support Services
290 W. Nationwide Blvd.
Columbus, OH 43215
transportevaluations@nisource.com

Sherry Epler
UGI Utilities, Inc. – Gas Division
1 UGI Drive
Denver, PA 17517
sepler@ugi.com

Ed Rogers
Valley Energy Inc.
523 South Keystone Avenue
Sayre, PA 18840-0340
erogers@ctenterprises.org

Carlos Thillet
Manager, Gas Supply and Transportation
PECO
2301 Market Street, S9-2
Philadelphia, PA 19103
Carlos.thillet@exeloncorp.com



Todd S. Stewart

DATED: October 17, 2024