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File #: 209228

February 20, 2025

***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: National Fuel Gas Distribution Corporation's Purchased Gas Cost Filing Under  
Section 1307(f) of the Public Utility Code and 52 Pa. Code §§ 53.64 and 53.65  
Docket No. R-2025-3052742**

Dear Secretary Chiavetta:

Attached for filing please find the Prehearing Conference Memorandum on behalf of National Fuel Gas Distribution Corporation in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/sa  
Attachment

cc: The Honorable Charece Z. Collins (*via email; w/attachment*)  
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).

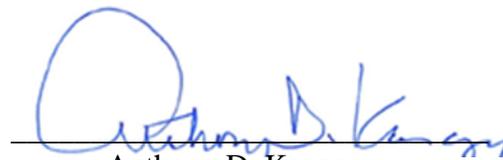
### VIA E-MAIL

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Date: February 20, 2025



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	R-2025-3052742
	:	
National Fuel Gas Distribution Corporation	:	

**PREHEARING MEMORANDUM OF  
NATIONAL FUEL GAS DISTRIBUTION CORPORATION**

**TO ADMINISTRATIVE LAW JUDGE CHARECE Z. COLLINS:**

Pursuant to 52 Pa. Code § 5.224(c) and Administrative Law Judge Charece Z. Collins (“ALJ”) Prehearing Conference Order dated February 18, 2025, National Fuel Gas Distribution Corporation (“Distribution”) hereby submits this Prehearing Conference Memorandum.

**I. PROCEDURAL HISTORY**

On December 30, 2024, Distribution filed data and exhibits supporting recovery of purchased gas costs in compliance with the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code §§ 53.64 - 53.65.

On January 7, 2025, the Office of Consumer Advocate (“OCA”) filed a Complaint and Public Statement.

On January 8, 2025, the Commission’s Bureau of Investigation & Enforcement (“I&E”) filed a Notice of Appearance.

On January 17, 2025, Distribution filed an Answer to OCA’s Complaint.

On January 21, 2025, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

On January 31, 2025, Distribution filed additional supporting data and exhibits as well as the prepared, written testimony of the six witnesses listed below in support of Supplement No. 280 to Tariff Gas — Pa. P.U.C. No. 9, to be effective for service rendered on and after August 1, 2025. Distribution also submitted a Tariff Addendum. The Tariff Supplement and the Addendum set forth the specific rates proposed by Distribution for recovery of purchased gas costs effective on August 1, 2025.

On February 3, 2025, Distribution filed replacement pages to Supplement No. 280 to Tariff Gas – Pa. P.U.C. No. 9.

On February 7, 2025, the OSBA filed a Complaint, Public Statement, and Verification.

On February 18, 2025, a Prehearing Conference Order was issued, which, among other things, scheduled a telephonic prehearing conference for February 24, 2025, at 10:00 AM, and directed the parties to file prehearing memoranda on or before February 20, 2025, at 4:00 PM.

## **II. COUNSEL**

Distribution will be represented by the following counsel in this proceeding:

Anthony D. Kanagy (ID # 85522)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
E-mail: akanagy@postschell.com

Distribution's counsel are authorized to receive copies of all documents served in this proceeding. Please include Mr. Kanagy on all correspondence in this proceeding. In addition, Distribution agrees to receive service of documents electronically in this proceeding. For the purposes of the February 24, 2025, Prehearing Conference, Mr. Kanagy will act as primary counsel for Distribution.

**III. WITNESSES AND ISSUES**

Distribution, as part of its direct case, presented the following witnesses who are testifying to the matters as explained in their statements and exhibits that were filed on January 31, 2025:

<b><u>Witness</u></b>	<b><u>Statement</u></b>
Christopher A. Cej National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 1 and Exhibits identified therein
Marc T. Cuthbertson National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 2 and Exhibits identified therein
Caitlin A. DiGiore National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 3 and Exhibits identified therein
Lisa A. Petko National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 4 and Exhibits Identified therein.
Shannon Putnam National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 5 and Exhibits identified therein
Tracy Wesoloski National Fuel Gas Distribution Corporation 6363 Main Street Williamsville, NY 14221	Distribution PGC Statement No. 6 and Exhibits identified therein

The issues and subject matter addressed by each witness are set forth in their direct testimony. Distribution may present additional witnesses, testimony and exhibits on matters arising during the course of the proceeding, including matters raised by other parties.

Distribution will amend its prefiled statements and exhibits, if appropriate, during the course of this proceeding, based upon more recent information, as such information becomes available. Such update(s) may reflect changes in information relevant to the determination of the proper level of purchased gas cost recovery rates for the 12 months ending July 31, 2025, including the effects of quarterly changes in rates for recovery of purchased gas costs pursuant to 52 Pa. Code § 53.64.(i)(5).

It is noted that the rates that will become effective on August 1, 2025, in all likelihood, will be different from the rates proposed by Distribution at this time because the final rates will be calculated to reflect the quarterly updates that became effective on February 1, 2025, and the quarterly update that will become effective on May 1, 2025, differences between projected and actual purchased gas costs and recoveries for the period through June 30, 2025, and changes in forecasts of gas costs during the application period.

#### **IV. PROPOSED SCHEDULE**

Distribution, I&E, OSBA, and the OCA have agreed to the following schedule for this proceeding:

<b>February 24, 2025</b>	Prehearing Conference
<b>March 7, 2025</b>	Written Direct Testimony of All Non-Company Parties
<b>March 19, 2025</b>	Written Rebuttal of All Parties
<b>March 24, 2025</b>	Written Surrebuttal Testimony of All Parties
<b>March 27, 2025</b>	Oral Rejoinder Outline
<b>March 28, 2025</b>	Telephonic Evidentiary Hearing
<b>April 4, 2025</b>	Main Briefs Due
<b>April 11, 2025</b>	Reply Briefs Due

**V. DISCOVERY**

Distribution does not propose any special orders regarding discovery. Interrogatories have already been served on Distribution in this proceeding. Distribution is unaware of any discovery disputes. Further, Distribution encourages the use of informal discovery.

Distribution believes that a protective order is necessary with regard to discovery in this proceeding. Distribution intends to request a protective order to limit the disclosure of competitive business information or other confidential information.

**VI. SETTLEMENT**

Distribution is willing to meet with the other parties to discuss settlement of this proceeding. To date, no settlement discussions have been held.

Respectfully submitted,



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Date: February 20, 2025

*Counsel for National Fuel Gas  
Distribution Corporation*