
Anthony D. Kanagy

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File #: 210335

April 9, 2025

VIA ELECTRONIC FILING

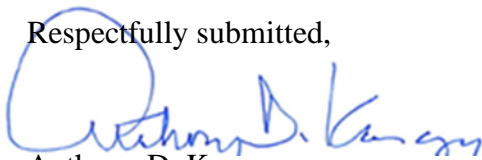
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Peoples Natural Gas Company LLC's Purchased Gas Cost Filing Under Section
1307(f) of the Public Utility Code and 52 Pa. Code §§ 53.64 and 53.65
Docket Nos. R-2025-3053184, et al**

Dear Secretary Chiavetta:

Attached for filing please find the Prehearing Conference Memorandum on behalf of Peoples Natural Gas Company LLC in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy
Principal

ADK/sa
Attachment

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

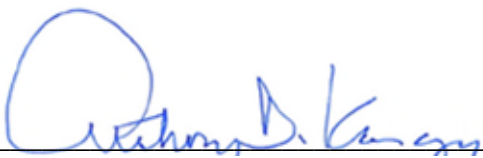
Carrie B. Wright, Esquire
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Pennsylvania Independent Oil & Gas
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Warrendale, PA 15086
Todd@pioga.org

Date: April 9, 2025



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|---|
| Pennsylvania Public Utility Commission, | : | |
| <i>et al.</i> | : | |
| v. | : | Docket Nos. R-2025-3053184, <i>et al.</i> |
| | : | |
| Peoples Natural Gas Company LLC | : | |

**PREHEARING CONFERENCE MEMORANDUM
OF PEOPLES NATURAL GAS COMPANY LLC**

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated April 1, 2025, Peoples Natural Gas Company LLC (“Peoples” or the “Company”) hereby submits this Prehearing Conference Memorandum in the above-captioned matter and states as follows:

I. PROCEDURAL HISTORY

On January 31, 2025, Peoples submitted its 60-day Purchased Gas Cost (“PGC”) 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.

On February 20, 2025, the Office of Consumer Advocate (“OCA”) filed a Formal Complaint and Public Statement.

On February 27, 2025, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

On February 28, 2025, Peoples submitted its 30-day PGC 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 and 53.65.

On March 28, 2025, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

On April 1, 2025, Peoples filed its unnumbered and undated Supplement to Tariff Gas – PA PUC No. 48, along with additional supporting data, exhibits, and the written direct testimony of the five witnesses listed below. The Tariff Supplement set forth the specific rates proposed by Peoples for recovery of purchased gas costs effective on October 1, 2025.

Also on April 1, 2025, Administrative Law Judge Katrina L. Dunderdale (the “ALJ”) issued a Prehearing Order, scheduling a Prehearing Conference in this matter for April 10, 2025, and requiring Prehearing Memoranda to be submitted by all parties on or before 12:00 p.m. on April 9, 2025.

On April 3, 2025, OSBA filed a Formal Complaint and Public Statement.

Peoples files this Prehearing Conference Memorandum in anticipation of the Prehearing Conference.

II. SERVICE OF DOCUMENTS

Peoples requests that Anthony D. Kanagy and Meagan Moore be listed on the service list on behalf of the Company. Their contact information is provided below:

Anthony D. Kanagy, I.D. No. 85522
Post & Schell, PC
17 North Second Street
12th Floor
Harrisburg, Pennsylvania 17101-1601
Phone: 717-612-6034
Fax: 717-731-1985
E-mail: akanagy@postschell.com

Meagan Moore, ID No. 317975
PNG Companies LLC
375 North Shore Drive
Pittsburgh, PA 15212
Phone: 412-208-6527
Email: meagan.moore@peoples-gas.com

Mr. Kanagy will be the primary attorney speaking on behalf of Peoples for the purposes of the Prehearing Conference. Peoples agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Andrew P. Wachter at Andrew.Wachter@peoples-gas.com, and Carol A. Scanlon at Carol.Scanlon@peoples-gas.com.

III. WITNESSES AND ISSUES

Below is a list of the witnesses that Peoples intends to call in this proceeding and the subject areas of their testimony. Further definition of the issues will be developed by the parties during the course of this proceeding. Peoples reserves the right to call additional witnesses, present testimony, or both on additional issues and subject matters that may arise during the course of this proceeding.

| <u>Witness</u> | <u>Statement</u> | <u>General Subject Matter</u> |
|---|----------------------------------|---|
| Carol A. Scanlon Rates Manager PNG Companies LLC 375 North Shore Drive Pittsburgh, PA 15212 | Peoples Natural Gas St. No. 1 | Overview; Filing Requirements; FERC Activities; Retainage; Audit Findings; Wagner Adjustment; and Settlement Updates. |

| | | |
|--|---|---|
| <p>Steven P. Kolich Director, Gas Supply PNG Companies LLC 375 North Shore Drive Pittsburgh, PA 15212</p> | <p>Peoples Natural Gas St. No. 2</p> | <p>Gas Procurement Policy and Supply Planning; Interstate Pipeline Transportation and Storage Capacity Portfolio; Natural Gas Supply Portfolio; Capacity Releases; Off System Sales; Purchases from Affiliates; Shut-In Practices and Policies; Operational Flow Orders and Overruns; Renegotiations of Contracts; and System Average BTU Value.</p> |
| <p>Dawn M. Folks Finance and Rates Analyst PNG Companies LLC 375 North Shore Drive Pittsburgh, PA 15212</p> | <p>Peoples Natural Gas St. No. 3</p> | <p>Waiver or Retainage Discounts; Proposed Tariff Changes; Over/Under Collections; PGC information; and Calculation of PGC Rates, Including AVC Charges and Balancing Charges.</p> |
| <p>Anton Ribich Finance and Rates Analyst PNG Companies LLC 375 North Shore Drive Pittsburgh, PA 15212</p> | <p>Peoples Natural Gas St. No. 4</p> | <p>Design Day Planning.</p> |
| <p>Lynda W. Petrichevich Senior Director, Process Operations PNG Companies LLC 375 North Shore Drive Pittsburgh, PA 15212</p> | <p>Peoples Natural Gas St. No. 5</p> | <p>Unaccounted for Gas; and Producer Retainage Charges.</p> |

Ms. Scanlon’s direct testimony also identifies the sponsoring witnesses for Peoples’ exhibits.

Peoples may amend its pre-filed statements and exhibits, as appropriate, during the course of this proceeding, based upon more recent information, as such information becomes available.

Such update(s) will reflect changes in information relevant to the determination of the proper level of PGC recovery rates to become effective October 1, 2025.

IV. DISCOVERY

Peoples understands that OCA is proposing discovery modifications in this proceeding. Peoples does not oppose those modifications with one clarification. For those discovery requests that were served on or before April 9, 2025, Peoples will use best efforts to answer those requests within 10 calendar days of the Prehearing Conference date. Peoples has received discovery from other parties and is working to answer the same. Peoples is not aware of any outstanding discovery disputes. Peoples is willing to work with the parties, through informal discovery, to expedite the discovery process. The protection of confidential information is addressed in Section VII., below.

V. PROCEDURAL SCHEDULE

The parties have agreed to the following Procedural Schedule in this proceeding:

| | |
|--|----------------|
| Prehearing Conference | April 10, 2025 |
| Direct testimony of parties other than Peoples | April 30, 2025 |
| Rebuttal testimony | May 13, 2025 |
| Surrebuttal testimony (in writing) | May 19, 2025 |
| Witness Lists | May 21, 2025 |
| Hearings – Oral Rejoinder | May 22, 2025 |
| Main Briefs | June 6, 2025 |
| Reply Briefs | June 13, 2025 |

VI. PUBLIC INPUT HEARINGS

Peoples is not aware of any substantial consumer interest with respect to the proposed rate change. Peoples does not propose that any public input hearings be held absent substantial public interest in the filing.

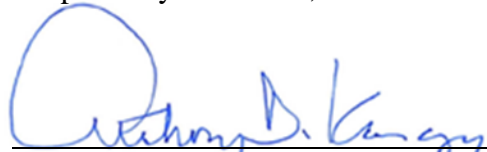
VII. PROTECTION OF CONFIDENTIAL INFORMATION

Peoples will submit a Motion for Protective Order for consideration by the ALJ. Peoples will seek the concurrence of the other parties as to the form of the Protective Order before submitting the Motion.

VIII. SETTLEMENT DISCUSSIONS

To date, no settlement discussions have been held. However, Peoples will be working with the parties in an effort to resolve these proceedings through settlement.

Respectfully submitted,



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Meagan Moore (ID # 317975)
PNG Companies LLC
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Pittsburgh, PA 15212
Phone: 412-208-6527
Email: meagan.moore@peoples-gas.com

Date: April 9, 2025

Attorneys for Peoples Natural Gas Company
LLC