



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 9, 2025

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission v.
Peoples Natural Gas Company, LLC – 1307(f)
Docket No. R-2025-3053184
I&E Prehearing Memorandum

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Carrie B. Wright' with a stylized flourish at the end.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
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CBW/ac
Enclosures

cc: Administrative Law Judge Katrina L. Dunderdale (via email – kdunderdal@pa.gov)
Per Certificate of Service

I. INTRODUCTION

On January 31, 2025, Peoples Natural Gas Company LLC (Peoples Natural Gas, PNG, or Company) submitted its prefiling information in support of its annual reconciliation of purchased gas costs rates. On February 28, 2025, PNG submitted additional prefiling information in support of its annual reconciliation of purchased gas costs rates. On April 1, 2025, PNG submitted its annual Purchased Gas Cost Rate filing pursuant to 66 Pa. C. S. §1307(f), including supporting testimony.

Carrie B. Wright of I&E entered her appearance on February 20, 2025, and Adam J. Williams of I&E entered his appearance on March 28, 2025. A prehearing conference is scheduled for Thursday, April 10, 2025 at 9 a.m. with Administrative Law Judge Katrina L. Dunderdale presiding. I&E submits this Memorandum in compliance with the Prehearing Conference Order dated April 1, 2025.

II. ISSUES

The following list represents I&E's preliminary determination of the potential issues in this case:

- 1) Unaccounted for Gas
- 2) Retainage Rate
- 3) Capacity Release
- 4) Peak Day Forecasts
- 5) Voluntary Energy Reduction Program
- 6) E-factor Calculation
- 7) Interest rate calculation for over/under collections
- 8) Supplier Refunds
- 9) Pipeline Penalty Credits

10) Peak Day Demand

The list is as complete as can be made at this time. I&E reserves the right to address other issues, as it deems appropriate, if any such relevant issues arise.

III. WITNESSES

I&E expects to call the following expert witnesses at this docket without being limited thereto:

- Ethan Cline, Fixed Utility Valuation Engineer
- Anthony Spadaccio, Fixed Utility Financial Analyst Supervisor

I&E witnesses may be contacted through the information listed above for Ms. Wright or Mr. Williams. The witness list is provided without the benefit of complete discovery or analysis of the positions of other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the names of the witnesses listed above.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports. However, there may be issues of Commission policy or legal representation that are not properly the subject of testimony or there may be factual issues that are clear on the record and need not be supported by testimony. I&E reserves the right to dispense with testimony, when, in its opinion, an issue can be adequately addressed through briefing.

V. DISCOVERY

Due to the time limitations in the proceedings, I&E requests that the Commission's Rules of Practice and Procedure for the conduct of discovery be modified as follows:

1. Answers to written interrogatories shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories shall be communicated orally to the opposing party within three (3) calendar days of service; unresolved objections shall be served to the other party in writing within seven (7) days of service of interrogatories.
3. Motion to dismiss objections and/or direct the answering of interrogatories shall be filed within five (5) calendar days of service of written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within five (5) calendar days of service of such motions.
5. Discovery or discovery-related pleadings served after 12:00 noon on a Friday or after 12:00 p.m. on any business day preceding a state holiday will be deemed to be served on the next business day.
6. I&E concurs with the discovery modifications proposed by the Office of Consumer Advocate ("OCA").

VI. SCHEDULE

I&E is committed to cooperating with all parties and with Judge Dunderdale to finalize an acceptable procedural schedule.

VII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E proposes to only serve and accept electronic delivery of documents. If ALJ Dunderdale and/ or any party prefers to have additional service (or “hard copies”) of documents by mail, I&E will certainly provide such service.

VIII. SETTLEMENT

I&E intends to participate in any settlement discussions and is willing to work with the parties to reach a resolution of any or all issues. In the event settlement discussions fail to result in a complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding as warranted.

Respectfully Submitted,

A handwritten signature in black ink that reads "Carrie B. Wright". The signature is written in a cursive style and is contained within a thin black rectangular border.

Carrie B. Wright
Deputy Chief Prosecutor
PA Attorney ID No. 208185

Adam J. Williams
Prosecutor
PA Attorney ID No. 310019

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

Dated: April 9, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3053184
 :
 Peoples Natural Gas Company, LLC – 1307(f) :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated April 9, 2025, in the manner and upon the persons listed below:


Served via Electronic Mail Only

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