



100 Allegheny Drive, Suite 104
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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

**In re: People's Natural Gas Company LLC Section 1307(f)-2025 Proceeding
Docket No. R-2025-3053184, et al.**

Dear Secretary Chiavetta:

Enclosed for filing, please find the Prehearing Conference Memorandum on behalf of the Pennsylvania Independent Oil & Gas Association (PIOGA) in the above-captioned proceeding. Copies of the same are being served on the Honorable Katrina L. Dunderdale, Administrative Law Judge, and all parties indicated on the Certificate of Service.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Pappasergi", with a stylized flourish at the end.

Todd M. Pappasergi, Esq.
General Counsel and Vice President
Governmental Affairs

cc: Hon. Katrina L. Dunderdale, Administrative Law Judge
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM OF
PENNSYLVANIA INDEPENDENT OIL & GAS ASSOCIATION**

TO THE HONORABLE KATRINA L. DUNDERDALE, ADMINSTRATIVE LAW JUDGE:

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and Your Honor’s Prehearing Conference Order in the above-captioned matter, the Pennsylvania Independent Oil & Gas Association (PIOGA) submits this Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

PIOGA adopts the Procedural History as stated in the Prehearing Conference Memorandum of Peoples Natural Gas Company. The only addition to said adoption is that PIOGA filed a Notice of Appearance concomitant with this Prehearing Conference Memorandum on April 9, 2025. PIOGA files this Prehearing Conference Memorandum in anticipation of the Prehearing Conference.

II. SERVICE OF DOCUMENTS

PIOGA requests that Todd M. Pappasergi, Esq. be listed on the service list on behalf of PIOGA, with the following contact information:

Todd M. Pappasergi, Esq.
Pa.I.D. No. 209389
General Counsel, Pennsylvania Independent Oil & Gas Association
100 Allegheny Drive, Suite 104
Warrendale, PA 15086

(724) 933-7306
todd@pioga.org

PIOGA agrees to receive service of all documents electronically in this matter.

III. WITNESSES AND ISSUES

PIOGA has not yet determined whether it will be necessary to provide any direct testimony. At this point, if direct testimony is needed, PIOGA designates its executive director, Daniel Weaver, 100 Allegheny Drive, Suite 104, Warrendale, PA 15086 as its witness. Based on its analysis of the filings in this matter to date, PIOGA will be focused on (1) least cost fuel procurement practices, policies, and methodologies, particularly as the same are related to locally produced gas from conventional formations; and (2) any potential renegotiation of contracts with PIOGA producer members. PIOGA reserves the right to add to or modify its witness list, and further reserves the right to identify, address, and raise any other issues that may affect PIOGA's interests, whether raised by Peoples or other parties to this matter.

IV. DISCOVERY

PIOGA is not aware of any discovery disputes and the proposed discovery schedules are acceptable. PIOGA has not received any discovery, nor does it anticipate serving any party with discovery at this time. PIOGA reserves the right to modify the same or to serve any party with discovery within the confines of the discovery schedule.

V. PROCEDURAL SCHEDULE

PIOGA agrees with the Procedural Schedule as stated by Peoples in its Prehearing Conference Memorandum, with one caveat: Your Honor indicated that the May 22, 2025 hearing may need to be in person. If the hearing is in Pittsburgh, undersigned counsel will be able to attend. However, if the hearing is in Harrisburg, because of an unavoidable, personal scheduling

conflict, undersigned counsel will likely be unable to attend and would request leave to participate virtually or for consideration of an alternative date.

VI. PUBLIC INPUT HEARINGS

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

VII. PROTECTION OF CONFIDENTIAL INFORMATION

PIOGA will commit to the protection of any confidential information pursuant to any such agreement or order.

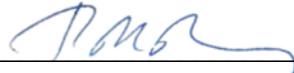
VIII. SETTLEMENT DISCUSSIONS

To date, no settlement discussions have been held. However, PIOGA is willing to participate in any settlement discussions with the parties.

RESPECTFULLY SUBMITTED,

Dated: April 9, 2025

By: _____



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General Counsel
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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 Email Only:

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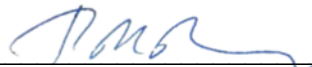
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Email: meagan.moore@peoples-gas.com

RESPECTFULLY SUBMITTED,

Dated: April 9, 2025

By: _____



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