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April 10, 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 Petition to Intervene 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.M.P.", 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.
Peoples Natural Gas Company LLC

: : : : :
Docket Nos. R-2025-3053184, *et al.*

**PETITION TO INTERVENE OF THE PENNSYLVANIA
INDEPENDENT OIL & GAS ASSOCIATION**

AND NOW, comes the Pennsylvania Independent Oil & Gas Association (PIOGA), by and through its general counsel, Todd M. Pappasergi, Esq., and petitions to intervene in the above-captioned proceeding pursuant to 52 Pa.Code §§ 5.72-575, and, in support thereof, states as follows:

1. PIOGA is a duly-registered Pennsylvania not-for-profit trade association representing oil and natural gas interests in Pennsylvania. PIOGA’s members include natural gas producers and Pennsylvania Public Utility Commission-licensed natural gas suppliers and marketers (NGSs) that produce, transport and market natural gas, including Pennsylvania Appalachian production, on the pipeline system of the Peoples Natural Gas Company LLC (Peoples) for system supply and transportation customers.

2. On February 28, 2025, Peoples filed the materials required by the Commission’s regulations at Title 52, Chapter 53 of the Pennsylvania Administrative Code before the filing of a tariff under 66 Pa.C.S. § 1307(f). Peoples served PIOGA with these materials.

3. On April 1, 2025, Peoples filed its annual, definitive filing pursuant to Section 1307(f)(1), consisting of Peoples' direct testimony, exhibits, and Pro Forma Tariff Supplement. Once again, Peoples served PIOGA with the same.

4. Additionally, the Administrative Law Judge presiding over this matter, the Honorable Katrina L. Dunderdale, has served PIOGA with all orders issued to date in this matter.

5. PIOGA participated in the Prehearing Conference held by ALJ Dunderdale with the parties on April 10, 2025 during which ALJ Dunderdale indicated that a Petition to Intervene would be appropriate and necessary despite the above-referenced provisions of service.

6. Relevant to the instant proceeding, the gas cost rates established in this proceeding will be the rates against which PIOGA's NGS members will compete to serve their existing customers and to obtain new customers on the Peoples system. PIOGA members' operations are directly affected by the company's least cost fuel procurement practices, methodologies and policies, as PIOGA members' Pennsylvania Appalachian production continues to be a source of baseload supply for the Peoples system and customers. PIOGA producers and its NGS members' transportation customers are also directly affected by Peoples' practices, methodologies and policies concerning pipeline replacements and abandonments, lost and unaccounted for gas (LUFG), and retainage rates and measures to reduce LUFG. These are all matters raised by Peoples in its Section 1307(f) filings.

7. PIOGA and its members will be bound by the Commission's determinations in this proceeding.

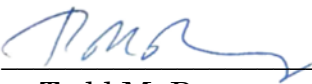
8. PIOGA's interests and the interests of its members cannot be adequately represented by any other party in this proceeding, including any PIOGA member that may participate individually that may raise issues specific to its relationships with Peoples or any other non-PIOGA member producer or NGS. Moreover, permitting PIOGA to advocate on behalf of the natural gas production industry and its members at large is consistent with notions of judicial economy and efficiency.

9. PIOGA's intervention is also in the public interest. PIOGA has consistently participated in the Peoples companies' previous Section 1307(f) proceedings as well as Peoples' 2019 and 2024 base rate proceedings, all of which places PIOGA in a position to contribute to this proceeding's record.

WHEREFORE, PIOGA respectfully requests that the instant Petition to Intervene in the above-captioned proceeding be GRANTED.

RESPECTFULLY SUBMITTED,

Dated: April 10, 2025

By: 

Todd M. Pappasergi, Esq.
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General Counsel
Pennsylvania Independent Oil
& Gas Association
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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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RESPECTFULLY SUBMITTED,

Dated: April 9, 2025

By: 

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