



COMMONWEALTH OF PENNSYLVANIA

April 11, 2025

E-FILED

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

Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation – 1307(f) / Docket No. R-2025-3052742

Dear Secretary Chiavetta:

The Office of Small Business Advocate (“OSBA”) submits this letter to inform the Public Utility Commission that it does not oppose the *Joint Petition for Settlement of the Section 1307(f) Rate Investigation* filed by the parties in the above-referenced proceeding. The OSBA filed a Complaint in this proceeding on February 7, 2025.

As set forth in the OSBA’s February 20, 2025, prehearing memo, the OSBA reviewed the following issues set forth in the annual Purchased Gas Cost (“PGC”) Rate filing of National Fuel Gas Corporation (“NFG” or the “Company”):

- NFG’s lost and unaccounted-for gas rates;
- the Company’s gas price hedging strategy;
- the Company’s design day demand forecasting and peak day capacity requirements;
- the Company’s gas supply mix and strategy for basin diversification;
- the reasonableness of NFG’s MMT transportation rate;
- the Company’s DMT customer imbalances;
- NFG’s strategy for capacity release, off-system sales, asset management arrangements, and storage fill agreements; and
- whether the Company’s pilot program to procure certified natural gas is functioning properly.

The OSBA also engaged in settlement discussions with NFG and the other parties. The OSBA did not identify any aspects of the issues, set forth above, that were unjust or unreasonable to small business customers. Therefore, this letter serves as formal notice that the OSBA does not oppose the *Joint Petition for Settlement of the Section 1307(f) Rate Investigation* filed by the other parties.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3052742
	:	
National Fuel Gas Distribution Corporation – 1307(f)	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charece Collins
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
charcollin@pa.gov

Harrison W. Breitman, Esquire
Katherine M. Kennedy, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
OCANFG1307F@paoca.org

Carrie B. Wright, Esquire
Deputy Chief Prosecutor
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
carwright@pa.gov

Anthony D. Kanagy, Esquire
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
akanagy@postschell.com

Date: April 11, 2025

/s/ Steven C. Gray

Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538