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May 5, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.;
Docket No. R-2025-3053499; C-2025-3054780; **PREHEARING ONFERENCE
MEMORANDUM OF THE PENNSYLVANIA STATE UNIVERSITY**

Dear Secretary Homsher:

Attached for filing is the Prehearing Conference Memorandum of The Pennsylvania State University. Copies of this document have been served in accordance with the attached Certificate of Service.

If you have any questions with regard to this filing, please direct them to me. Thank you for your attention to this matter.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Thomas J. Sniscak
Erich W. Struble

Counsel for The Pennsylvania State University

WES/das
Enclosures

cc: Administrative Law Judge Jeffrey A. Watson (by email, jeffwatson@pa.gov)
Administrative Law Judge Chad L. Allensworth (by email, callenswor@pa.gov)
Mary Swarner, Legal Assistant (mswarner@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2025-3053499
	:		C-2025-3054434
v.	:		C-2025-3054552
	:		C-2025-3054662
Columbia Gas of Pennsylvania, Inc.	:		C-2025-3054780

**PREHEARING CONFERENCE MEMORANDUM OF
THE PENNSYLVANIA STATE UNIVERSITY**

**TO: ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON AND
ADMINISTRATIVE LAW JUDGE CHAD L. ALLENSWORTH**

Pursuant to the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations at 52 Pa. Code § 5.222(d)(1) and the April 24, 2025 Prehearing Conference Order, The Pennsylvania State University (“PSU”), by and through its counsel in this matter, hereby submits this Prehearing Conference Memorandum in the above-captioned proceeding for the initial telephonic prehearing conference scheduled for May 7, 2025.

I. REQUEST TO UPDATE SERVICE LIST

In accordance with the Commission’s Order entered April 24, 2025, e-mail service is acceptable for PSU counsel. Hard copy service is not required at this time. E-mail service of documents in this proceeding shall be accepted on behalf of PSU by the following:

Whitney E. Snyder, Attorney I.D. No. 316625
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Should hard copy service become necessary as this proceeding progresses, hard copy service can be sent to the attorneys at the address listed above. For purposes of the prehearing conference, Erich Struble will be speaking on behalf of PSU.

II. PROCEDURAL HISTORY

On March 20, 2025, Columbia Gas filed Supplement No. 392 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 392”). Supplement No. 392 proposes to increase rates to produce additional annual operating revenues of approximately \$110.5 million, and a request for approval of a Revenue Normalization Adjustment mechanism to stabilize utility revenue regardless of changes in actual customer usage and to make permanent Columbia’s current Pilot Weather Normalization Adjustment. Columbia’s filing also includes requests to extend its Energy Efficiency Pilot for residential customers and to initiate an Energy Efficiency Program Pilot for small commercial customers. Columbia further requests Commission approval of an Economic Development Distribution Service tariff to allow Columbia the flexibility to enter into individual contracts with new large volume customers. Columbia Gas proposed that the rate increase become effective on May 19, 2025.

On April 8, 2025 and April 11, 2025, the Office of Consumer Advocate and the Office of Small Business Advocate, respectively, filed Formal Complaints. Various oppositions were also filed.

By Order entered on April 24, 2025, the Commission instituted an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase. Pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. § 1308(d), Supplement No. 392 was suspended by operation of law until December 19, 2025 unless permitted by Commission Order to become effective at an earlier date. In addition, the Commission ordered that the investigation include

consideration of the lawfulness, justness, and reasonableness of Columbia's existing rates, rules, and regulations. The matter was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Jeffrey A. Watson ("ALJ Watson") and Administrative Law Judge Chad L. Allensworth ("ALJ Allensworth").

On April 24, 2025, PSU filed a Formal Complaint to the proposed rate increase. PSU is a major sales and distribution customer of Columbia at its University Park Campus and at its Beaver, Fayette, Mont Alto, and York Campuses, as well as at the PSU Fruit Research and Extension Center in Biglerville, Pennsylvania. In 2024, PSU received approximately 2,323,193.28 dekatherms (Dth) through distribution service from Columbia. PSU takes natural gas service under the following tariff rate classifications: LDS (Large Distribution Service); SDS (Small Distribution Service); SGDS (Small General Distribution Service); and RSS (Residential Sales Service). As a major customer, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby.

On April 24, 2025, the Commission issued a Notice setting an Initial Telephonic Prehearing Conference for Wednesday, May 7, 2025, at 9:00 a.m. before ALJ Watson and ALJ Allensworth. On April 24, 2025, ALJ Watson and ALJ Allensworth issued a Prehearing Conference Order requiring each party to file a Prehearing Conference Memorandum on or before May 5, 2025.

III. ISSUES

Subject to discovery and issues raised by PSU and other parties, PSU intends to address the issue of whether the service PSU takes under certain rate categories may be burdened with a disproportionate share of the overall increase requested and whether Columbia's cost allocations and Cost of Service Study as well as the proposed distribution of its recommended revenue requirement are unreasonable and discriminatory.

Furthermore, the Company's proposed Gas Procurement Charge must be examined to determine if the costs allocated are appropriate and to determine if it serves to place Columbia's own system supply gas in a more favorable position. Additionally, potential changes in the requirements the Company imposes on customers that procure gas from alternative suppliers and Columbia's potential modification of its transportation regulations must be monitored and potentially addressed in this proceeding.

PSU's position will be finalized in its evidence and briefs submitted under the schedule developed in this case.

IV. WITNESSES

PSU may offer the testimony of James L. Crist, P.E., in support of its positions. Mr. Crist's business address, telephone number and e-mail address are:

James L. Crist, P.E.
Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
(412) 487-9708
JLCrist@aol.com

PSU requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted be e-mailed directly to Mr. Crist at JLCrist@aol.com.

If called, Mr. Crist may present testimony regarding the requested revenue increase of Columbia Gas and the allocation of that revenue between customer classes, along with the rate design and operational requirements of specific rate schedules. Mr. Crist may also present testimony concerning the Company's Revenue Normalization Adjustment, Gas Procurement Charge, Cost of Service Study, and potential changes in the requirements the Company imposes on customers that procure gas from alternative suppliers and Columbia's potential modification of its transportation regulations. He may also provide testimony regarding Columbia's proposed Commercial Energy Efficiency Program.

V. PROCEDURAL SCHEDULE

PSU is amenable to working with the other parties to develop a mutually satisfactory schedule.

VI. DISCOVERY

PSU takes no position on modification of the discovery schedule at this time, but is willing to work with the parties on mutually agreeable modifications.

WHEREFORE, The Pennsylvania State University respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

/s/ Whitney E. Snyder

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Counsel for The Pennsylvania State University

Dated: May 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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/s/ Whitney E. Snyder

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Dated this 5th day of May, 2025