



May 5, 2025

***Via E-Mail Only***

Honorable Jeffrey A. Watson  
Honorable Chad Allensworth  
Pennsylvania Public Utility Commission  
301 Fifth Avenue, Suite 220,  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)  
[callenswor@pa.gov](mailto:callenswor@pa.gov)

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.  
Docket No. R-2025-3053499**

***Prehearing Memorandum of CAUSE-PA***

Your Honor:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

John W. Sweet, Esq.  
*Counsel for CAUSE-PA*

CC: Secretary Matthew Homsher (via E-file)  
Mary Swarner, Legal Assistant, [mswarner@pa.gov](mailto:mswarner@pa.gov) (via E-mail)  
Certificate of Service



On April 24, 2025, a Prehearing Conference Order was issued by the Honorable Administrative Law Judges (ALJ) Jeffrey A. Watson and Chad Allensworth setting a telephonic prehearing conference for Wednesday, May 7, 2025 at 9:00 a.m., and requiring parties to file a Prehearing Memorandum no later than Monday, May 5, 2025 at 4:30 p.m. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum.

**I. Background**

On March 20, 2025, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) submitted a rate filing pursuant to Section 1308(d) of the Public Utility Code, Supplement No. 392 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 392”) in which it proposes to increase rates to its customers by approximately \$110.5 million per year over existing rates. (Filing Cover Ltr. at 1).

On April 11, 2025, CAUSE-PA filed a Petition to Intervene and Answer in the above-captioned proceeding, in which CAUSE-PA respectfully requests that the Commission enter an order granting CAUSE-PA full status as an intervener in this proceeding with active party status.

**II. Issues to be Presented**

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, Columbia Gas must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2203. In determining whether rates are just and reasonable, the Commission must examine whether rates are affordable and accessible to those served.

If the Commission approves any gas distribution rate increase, the Commission should condition approval on Columbia Gas's agreement to perform such actions as are necessary to ensure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of Columbia Gas's proposed tariff changes and testimony and opposes Columbia Gas's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding to determine whether Columbia Gas's proposals are just, reasonable, and in the public interest -- though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of Columbia Gas's rate filing and proposed rate increase on low income households.
- ii. The effect of Columbia proposal to increase its monthly residential customer charge from \$17.25 to \$31.97. (Columbia St. 6 at 21), including the effect of this proposed increase on low income households, and on the ability to achieve appreciable bill savings through adoption of energy efficiency measures.
- iii. Columbia's proposed Revenue Normalization Adjustment (RNA) (Columbia St. 6 at 26), including the effect of this alternative ratemaking mechanism on low income households, and on the ability to achieve appreciable bill savings through energy efficiency measures.
- iv. Columbia's request that the Commission approve its pilot Weather Normalization Adjustment (WNA) as a permanent program (Columbia St. 17 at 27-28), including the effect of this alternative ratemaking mechanism on low income and otherwise economically vulnerable customers. Based on a preliminary review, CAUSE-PA submits that the continued

application of the WNA may result in unjust, unreasonable, and discriminatory rates for consumers.

- v. Whether Columbia's proposed Phase II Energy Efficiency and Conservation (EE&C) Plan provides adequate and proportional low income programming; and whether it will properly incentivize adoption of energy efficiency measures in multifamily buildings. (Columbia St. 13 at 8-23).
- vi. The effect of Columbia Gas's rate filing and proposed rate increase on low income households enrolled in or eligible for the Company's Universal Service and Energy Conservation Programs, and the continued adequacy of those programs in delivering universally accessible service.

### **III. Witnesses and Testimony**

CAUSE-PA intends to present the following witnesses to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to

Your Honors and the parties:

Harry Geller, Esq.  
118 Locust Street  
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Patrick Cicero, Esq.  
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[pcicero@pautilitylawproject.org](mailto:pcicero@pautilitylawproject.org)

Mr. Geller and Mr. Cicero will address the issues identified above, as well as other issues that may arise throughout this proceeding.

CAUSE-PA reserves the right to call additional or substitute witnesses as may be warranted, upon proper notice to Your Honors and the parties.

**IV. Discovery**

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

**V. Public Input Hearings**

CAUSE-PA supports the scheduling of public input hearings in this matter. CAUSE-PA recommends that the Commission consider the use of telephonic and in-person public input hearings to encourage participation by the ratepayers.

**VI. Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

**VII. Service on CAUSE-PA**

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

John W. Sweet, Esq.  
Ria M. Pereira, Esq.  
Lauren N. Berman, Esq.  
**PENNSYLVANIA UTILITY LAW PROJECT**  
118 Locust Street  
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

**VIII. Representation of CAUSE-PA at Prehearing Conference**

At the Prehearing Conference, CAUSE-PA will be represented by John W. Sweet, Esq.

**IX. Litigation Schedule**

CAUSE-PA is currently involved in discussions with the Company and other parties to reach a mutually agreeable litigation schedule.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Memorandum.

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



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May 5, 2025

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2025-3053499  
 :  
 Columbia Gas of Pennsylvania, Inc. :

**Certificate of Service**

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**Via Email**

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